

Pre-released portions of the FBI file on the El Dorado Chemical Company

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U.S. Department of Justice

Federal Bureau of Investigation
Washington, D.C. 20535

June 1, 2018

MR. RUSS KICK
POST OFFICE BOX 36914
TUCSON, AZ 85740

FOIPA Request No.: 1406389-000
Subject: EL DORADO CHEMICAL
COMPANY

Dear Mr. Kick:

Records responsive to your request were previously processed under the provisions of the Freedom of Information Act. Enclosed are 492 pages of previously processed documents and a copy of the Explanation of Exemptions. This release is being provided to you at no charge.

Documents or information referred to other Government agencies were not included in this release.

Please be advised that additional records potentially responsive to your subject may exist. If this release of previously processed material does not satisfy your information needs for this request, you may request an additional search for records. Submit your request by mail or fax to – Work Process Unit, 170 Marcel Drive, Winchester, VA 22602, fax number (540) 868-4997. Please cite the FOIPA Request Number in your correspondence.

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the Freedom of Information Act (FOIA). See 5 U.S. C. § 552(c) (2006 & Supp. IV (2010)). This response is limited to those records subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

For questions regarding our determinations, visit the www.fbi.gov/foia website under “Contact Us.” The FOIPA Request Number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

You may file an appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, Suite 11050, 1425 New York Avenue, NW, Washington, D.C. 20530-0001, or you may submit an appeal through OIP's FOIAonline portal by creating an account on the following web site: <https://foiaonline.regulations.gov/foia/action/public/home>. Your appeal must be postmarked or electronically transmitted within ninety (90) days from the date of this letter in order to be considered timely. If you submit your appeal by mail, both the letter and the envelope should be clearly marked “Freedom of Information Act Appeal.” Please cite the FOIPA Request Number assigned to your request so it may be easily identified.

You may seek dispute resolution services by contacting the Office of Government Information Services (OGIS) at 877-684-6448, or by emailing ogis@nara.gov. Alternatively, you may contact the FBI's FOIA Public Liaison by emailing foipaquestions@fbi.gov. If you submit your dispute resolution correspondence by email, the subject heading should clearly state "Dispute Resolution Services." Please also cite the FOIPA Request Number assigned to your request so it may be easily identified.

Sincerely,



David M. Hardy
Section Chief,
Record/Information
Dissemination Section
Information Management Division

Enclosure(s)

EXPLANATION OF EXEMPTIONS

SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552

- (b)(1) (A) specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and (B) are in fact properly classified to such Executive order;
- (b)(2) related solely to the internal personnel rules and practices of an agency;
- (b)(3) specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute (A) requires that the matters be withheld from the public in such a manner as to leave no discretion on issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;
- (b)(4) trade secrets and commercial or financial information obtained from a person and privileged or confidential;
- (b)(5) inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;
- (b)(6) personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;
- (b)(7) records or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records or information (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of confidential source, including a State, local, or foreign agency or authority or any private institution which furnished information on a confidential basis, and, in the case of record or information compiled by a criminal law enforcement authority in the course of a criminal investigation, or by an agency conducting a lawful national security intelligence investigation, information furnished by a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or (F) could reasonably be expected to endanger the life or physical safety of any individual;
- (b)(8) contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or
- (b)(9) geological and geophysical information and data, including maps, concerning wells.

SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552a

- (d)(5) information compiled in reasonable anticipation of a civil action proceeding;
- (j)(2) material reporting investigative efforts pertaining to the enforcement of criminal law including efforts to prevent, control, or reduce crime or apprehend criminals;
- (k)(1) information which is currently and properly classified pursuant to an Executive order in the interest of the national defense or foreign policy, for example, information involving intelligence sources or methods;
- (k)(2) investigatory material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under Federal programs, or which would identify a source who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(3) material maintained in connection with providing protective services to the President of the United States or any other individual pursuant to the authority of Title 18, United States Code, Section 3056;
- (k)(4) required by statute to be maintained and used solely as statistical records;
- (k)(5) investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualifications for Federal civilian employment or for access to classified information, the disclosure of which would reveal the identity of the person who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(6) testing or examination material used to determine individual qualifications for appointment or promotion in Federal Government service he release of which would compromise the testing or examination process;
- (k)(7) material used to determine potential for promotion in the armed services, the disclosure of which would reveal the identity of the person who furnished the material pursuant to a promise that his/her identity would be held in confidence.

FBI

TRANSMIT VIA:

- Teletype
 Facsimile
 AIRTEL

PRECEDENCE:

- Immediate
 Priority
 Routine

CLASSIFICATION:

- TOP SECRET
 SECRET
 CONFIDENTIAL
 UNCLAS E F T O
 UNCLAS

Date 1/18/79b6
b7C

TO: DIRECTOR, FBI
 FROM: SAC, SACRAMENTO (206-12) (P)
 SUBJECT: CHANGED GTOV

EL DORADO CHEMICAL COMPANY, INC.,
 6700 LOOKOUT ROAD,
 SAN ANTONIO, TEXAS,
Doing Business With
 U. S. AIR FORCE,
 MC CLELLAN AFB, CALIFORNIA
 FAG - DOD (FALSE CLAIMS) (A)
 OO: SC

Title marked changed to correct spelling of
 [redacted] and add middle initial as contained in DCAA
 Audit Report.

Enclosed for the Bureau are four copies of an
 LHM concerning the captioned subjects.

For the information of the Bureau, El Dorado's
 supplier is R. M. Hughes and Company, Inc., San Antonio,
 Texas, which is the subject of an investigation being
 conducted by the San Antonio Division, San Antonio file
 206-2.

REC-60

DE-36

N 206-76-1

Investigation continuing.

(2) - Bureau (Enc. 4) ENCLOSURE
 2 - Sacramento
 CAL/ab
 (4)

17 JAN 20 1979

Approved: REW/pe

Transmitted _____

(Number) (Time)

SIX

Per



UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

In Reply, Please Refer to
File No.

Sacramento, California
January 18, 1979

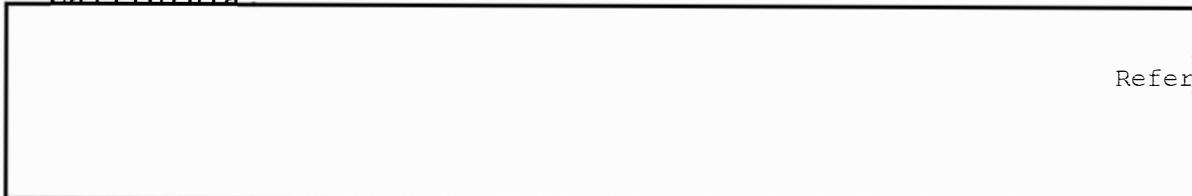


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EL DORADO CHEMICAL COMPANY,
INC.,
6700 LOOKOUT ROAD,
SAN ANTONIO, TEXAS,
Doing Business With
U. S. AIR FORCE,
MC CLELLAN AIR FORCE
BASE, CALIFORNIA

Information has been received from the Office of Special Investigations (OSI), McClellan Air Force Base, Sacramento, California, that allegations had been made that El Dorado Chemical Company, Inc. (ECC), had defrauded the U. S. Air Force in connection with contract number F04699-76-90268, which contract is for \$1,415,000 and involves the desealing of F-111 fighter aircraft fuel tanks.

The allegations were that ECC charged the Air Force for more chemicals, known as SR-51, SR-51A, and GD500, than were actually used, and secondly that used chemicals were filtered and reused when the contract called for new chemicals and new containers, which were to be shipped from San Antonio, Texas, to Sacramento, California



Referral/Direct

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

206-76-1

ENCLOSURE

206-HQ-76-1 FDPS page 5 & 6

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[redacted]

[redacted]

Referral/Direct

ECC was incorporated in the state of Texas on
July 14, 1970. The incorporators and directors are

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[redacted]

[redacted]

Referral/Direct

Chief Assistant U. S. Attorney Malcolm Segal,
Eastern District of California, Sacramento, was contacted
and apprised of the allegations in this matter and requested
that FBI investigation be conducted to prove or refute
the allegation, and if proven, he would authorize prosecution
of the responsible individuals.

Investigation continuing.

FBI

TRANSMIT VIA:

- Teletype
- Facsimile
- Airtel

PRECEDENCE:

- Immediate
- Priority
- Routine

CLASSIFICATION:

- TOP SECRET
- SECRET
- CONFIDENTIAL
- E F T O
- CLEAR

Date 7/22/78

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TO: DIRECTOR, FBI
 FROM: SAC, SAN ANTONIO (46-3022) (P)
 RE: UNSUB
 dba R. M. Hughes Company *encl.*
 FAG-USAF (FRAUDULENT INVOICES) (A)

OO: SA

Enclosed for the Bureau are four copies of a self explanatory LHM.

EX-114
 REC-6
 204-76-X
 46-73561

5 JUL 27 1978

Bureau (Enc. 4)
 2-San Antonio
 JWK:dso
 (4)

ENCLOSURE

1
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Subject

STAY
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247

7/26/78

Approved: 54119221978

Transmitted _____
 (Number) (Time)

Per _____



UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

In Reply, Please Refer to
File No.

San Antonio, Texas

July 22, 1978

UNKNOWN SUBJECT;
DOING BUSINESS AS
R. M. HUGHES COMPANY
FRAUD AGAINST THE GOVERNMENT -
UNITED STATES AIR FORCE
(FRAUDULENT INVOICES)

On May 19, 1978, U. S. Air Force, Office of Special Investigations (OSI), Kelly Air Force Base (AFB), Texas, advised that a preliminary investigation conducted by that organization developed information that the R. M. Hughes Company, San Antonio, Texas, had furnished fraudulent invoices to the El Dorado Chemical Company, San Antonio, Texas, in an attempt to defraud the United States Government.

Information was developed that the R. M. Hughes Company had supplied chemicals to El Dorado Chemical Company and that the prices paid for these chemicals formed part of the cost and pricing data used to negotiate a government contract which El Dorado Chemical Company has with the U. S. Air Force at McClellan AFB, California, for chemicals utilized in the desealing operation for the F-111 fighter/bomber fuel tanks. The Defense Contract Audit Agency, San Antonio, Texas, uncovered a payment to the R. M. Hughes Company for \$60,000 for two chemical compounds utilized in the contract that El Dorado Chemical Company has with the U. S. Air Force. El Dorado Chemical Company is supposed to be the sole source of chemicals utilized in this contract. Further, it was developed by the Defense Contract Audit Agency that El Dorado Chemical Company did not manufacture chemicals themselves because the Environmental Protection Agency had refused to allow them permission to manufacture the chemicals involved in the contract because of their odor.

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

206-76-X
ENCLOSURE
46-73361-1

R. M. HUGHES COMPANY

Subsequent preliminary investigation conducted by the U. S. Air Force, OSI, determined that El Dorado Chemical Company had leased land in Bandera, Texas, for the manufacture of chemicals utilized in their contract with the U. S. Air Force, however, were subsequently forced to cease operations by the Texas Air Control Board. The operation was subsequently recertified by the Texas Air Control Board as meeting minimum air pollution standards and was reopened in the name of R. M. Hughes Company.

On June 27, 1978, this matter was discussed with Assistant U. S. Attorney Wayne F. Speck, Chief, Criminal Division, Western District of Texas, San Antonio, Texas, who advised that in his opinion this matter had prosecutive merit and requested that the Federal Bureau of Investigation conduct further investigation into this matter.

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FEDERAL BUREAU OF INVESTIGATION

Reporting Office SAN ANTONIO	Office of Origin SAN ANTONIO	Date 3/13/79	Investigative Period 5/19/78 - 3/7/79
Title of Case [Redacted]		Report made by SA [Redacted]	Typed By JM
El Dorado Chemical Company, Inc. 6700 Lookout Road, San Antonio, Texas;		Character of Case FAG - DEPARTMENT OF DEFENSE (USAF - CONTRACT FRAUD) (A)	
R. M. Hughes, Inc., 614 South Medina, San Antonio, Texas			

SUMMARY

AH

PROSECUTIVE

Title marked "CHANGED" to identify subjects in this case. Title previously carried as "UNSUB, dba R. M. Hughes Company."

REFERENCE: San Antonio airtel to Bureau, July 22, 1978.

JW
CLW+CB

206-76-1X

Approved <i>[Signature]</i>	Special Agent in Charge <i>2CC DOJ 3/29/79 WJR</i>	Do not write in spaces below	
Copies made: Bureau 2-Criminal Division, USDJ 1-USA, San Antonio, Texas ATTN: WAYNE SPECK 1-USAF, OSI, District 10, Randolph AFB (7810D 58-530) 1-Sacramento (46-991) (Info) 2-San Antonio (206-2)	<i>1cc PCA& JWP/RD</i>	<i>1/3 1/3 1/3</i>	<i>DE 61</i>
		<i>2 MAR 28 1979 T-106</i>	<i>REC 113</i>
Notations: <i>1cc AA9 12/24/78</i>	<i>DO/J</i>		

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*1cc DOJ-FRAUD Cation
ATTN: [Redacted]*

9/1/73. TJB

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FEDERAL BUREAU OF INVESTIGATION

PROSECUTIVE REPORT OF INVESTIGATION CONCERNING

[REDACTED]
[REDACTED] EL DORADO
CHEMICAL COMPANY, INC.,
6700 LOOKOUT ROAD SAN ANTONIO, TEXAS;
[REDACTED] b6
[REDACTED] b7c
R. M. HUGHES, INC.,
614 SOUTH MEDINA, SAN ANTONIO, TEXAS,

FRAUD AGAINST THE GOVERNMENT -
DEPARTMENT OF DEFENSE
(UNITED STATES AIR FORCE -
CONTRACT FRAUD)

2-Criminal Division,
U. S. Department of Justice
1-United States Attorney,
San Antonio, Texas
1-Office of Special Investigations,
District 10, Randolph
Air Force Base, Texas
(7810D58-530)

Copy to:

2-Criminal Division, U. S. Department of Justice
1-United States Attorney, San Antonio, Texas
1-Office of Special Investigations, District 10
Randolph Air Force Base, Texas, (7810D58-530)

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Report of:

Date:

[REDACTED] March 13, 1979

Office: San Antonio, Texas

Field Office File #:

206-2

Bureau File #:

Narrative of Offense:

This investigation was predicated upon information received from the United States Air Force (USAF), Office of Special Investigations (OSI), Kelly Air Force Base, Texas, on May 19, 1978, pertaining to preliminary investigation conducted by OSI into the purported submission of fraudulent invoices by the R. M. Hughes Company, Inc. (RMH), to the El Dorado Chemical Company (EDC) in support of an EDC contract with the USAF to supply desealing chemicals for the F-111 Fighter/Bomber fuel tank program.

Referral/Direct

[REDACTED]

The Texas Air Control Board (TACB) cited RMH on August 16, 1977, for operating a small chemical plant in Bandera, Texas, which was not in conformance with Texas clean air standards. [REDACTED] RMH, submitted correspondence to the TACB in which he claimed the plant was utilized to reclaim a solution of aromatic thiols in hydrocarbon solvents, and it was the opinion of TACB that EDC and RMH were one and the same in that both processes utilized by RMH and EDC were identical and produced the exact same product.

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A former truck driver for EDC advised that when he transported chemicals to California, his loads would be "topped off" at a plant in California, and that sometimes he had to wait as much as eight hours in California while the plant there ran off a batch of the solution before he could make delivery. Twice he hauled empty barrels from Texas to California and usually he hauled 55-gallon drums of sludge from California to Texas where he observed EDC personnel recycle the sludge.

[REDACTED] advised he and [REDACTED] [REDACTED] EDC, entered into an agreement for RMH to furnish thioacten, the primary chemical element for a chemical compound used in aircraft fuel tank desealing, as a sole source supplier. At the time of this contract, EDC had a distillation unit established on a ranch in Bandera, Texas, however, it was inoperative at the time he entered into the agreement with [REDACTED] to furnish thioacten. This unit had formerly been operated by the [REDACTED] who he still employs to operate this unit as contract labor who are paid by check per gallon produced. He stated RMH does not receive a spent solvent utilized in the cleaning of aircraft fuel tanks in California that is subsequently recycled through distillation and thereafter, returned to the California company. He stated he sent a letter to the TACB stating the unit was utilized to reclaim a solution of aromatic thiols in hydrocarbon solvents, however, this was an exaggeration on his part as such information was required in order to be certified by the TACB. He denied that RMH and EDC are one in the same, or that they have a direct relationship or tie-in with each other. He denied submitting fraudulent, fictitious, or inflated invoices to EDC and stated that all shipments as recorded in official records of EDC were actually sent to EDC and that no shipments were overstated.

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[redacted] EDC, advised he set up a distillation unit on a ranch in Bandera, Texas, for RMH and taught [redacted] a [redacted] of his at Gary Aircraft Company, Hondo, Texas, how to operate it. RMH manufactures thioacten for EDC because it is too expensive for EDC to manufacture themselves because of clean air standards imposed by the TACB. The desealing chemical manufactured by EDC was previously shipped to a plant in California where it was expanded and thereafter, transported to the USAF at McClellan Air Force Base (MAFB), California. After the product was utilized by the USAF, it was shipped back to Texas for recycling by RMH for resale to the USAF.

[redacted] advised that EDC is known in the trade^{b6 b7C} as a compounder and as such purchases chemicals from other companies and thereafter mixes them and sells a finished product. Accordingly, EDC purchases a chemical known as thioacten from RMH which is utilized in an aircraft fuel tank desealing program for which EDC has a contract with the USAF. As such, RMH is a supplier, not a subcontractor. EDC operated a still on a ranch in Bandera, Texas, however, no thioacten was commercially produced which was utilized in support of EDC contracts with the USAF. This unit was subsequently turned over to RMH who produces thioacten from this unit which EDC purchases. Shipments of chemicals from EDC to MAFB were expanded in California prior to delivery to the USAF. No empty 55-gallon drums were transported from Texas to California. Sludge is returned to Texas from California and is recycled by RMH. EDC did re-use 55-gallon drums as well as recycle chemicals, although the costing data EDC furnished to the USAF was based on the cost of new chemicals, not recycled chemicals.

[redacted] in a reinterview, advised that the still utilized by RMH to manufacture thioacten was purchased by EDC and ultimately set-up on a ranch in Bandera, Texas, after EDC entered into a leasing agreement on November 25, 1975, the still and the lease site in Bandera, Texas, were turned over to RMH with the understanding that RMH would lease the site directly when the lease came up for renewal. Recycling and reuse of drums were attempted to reduce costs, however, both proved to be uneconomical and were discontinued. A company called North American Chemical Company (NACC) was

established by EDC in Stockton, California, and the production of materials utilized at MAFB began in mid 1977. EDC attempted to keep the details of its manufacturing process secret from the USAF for fear of it falling into the hands of a competitor and believed that its purchase of materials from RMH protected EDC from disclosure of EDC's knowledge of the distillation process utilized by RMH to the USAF. The USAF was purportedly aware that EDC was recycling chemicals and reusing drums including the fact that approximately 25% of the drums were reused. RMH is reclaiming solvents for EDC, however, the new material is only worth approximately \$.80 per gallon and as such, this reclamation process is more to conserve resources than for profit. EDC does not utilize RMH as a straw company; EDC has received all quantities of chemicals produced by RMH that were ordered by EDC; all invoices between RMH and EDC reflect actual amounts of chemicals ordered and received; neither RMH or EDC have received any kickbacks; and

[redacted] denied participation in, or any knowledge of, the submission of fraudulent invoices by RMH to EDC, or participation in the submission of defective pricing data to the USAF.

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SA 206-2

NAMES OF
DEFENDANTS:

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1.

[Redacted]	, described as:
Also known as	
<u>Date of Birth</u>	
<u>Place of Birth</u>	
Race	
Sex	
Hair	
Eyes	
Height	
Weight	
Scars and Marks	
Prior Military Service	
<u>Residence</u>	
Telephone Number	
Employment	
Texas Drivers License Number	
<u>Social Security</u> <u>Account Number</u>	

Full text of interviews pages 29 through 51,
attached.

2. [redacted] described as:

Date of Birth

Place of Birth

Race

Sex

Hair

Eyes

Height

Weight

Scars and Marks

Prior arrests

Military service

Highest rank held

Period of service

Discharge

Marital status

Wife

Residence

Home telephone

number

Employment

Work telephone

number

Drivers license

number

Social Security

Account Number

Full text of interview pages 22 through 24,
attached.

SA 206-2

3.

[redacted] described as:

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Race
Sex
Date of Birth
Place of Birth
Social Security
Account Number
Height
Weight
Hair
Eyes
Scars and Marks

Arrests

Military service

Marital status
Spouse
Residence
[redacted]

Employment

Texas driver's
license

Full text of interview pages 25 through 28,
attached.

SA 206-2

PROSECUTIVE STATUS:

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1. On March 7, 1979, the facts of this matter were discussed by Special Agent [redacted] with Assistant United States Attorney Wayne F. Speck, Chief, Criminal Division, Western District of Texas, San Antonio, Texas, who advised that he desired to review a written report of investigation conducted in this matter prior to rendering a prosecutive opinion.

2.

[redacted]
Special Agent, U. S. Air Force,
Office of Special Investigations
Kelly Air Force Base, Texas
[redacted]

Can furnish information that El Dorado Chemical Company was supplied chemicals by R. M. Hughes Company in support of a contract EDC had with the USAF at McClellan AFB, California., for desealing aircraft, and that the cost of these chemicals formed part of the cost in pricing data utilized in negotiating the contract. Further, RMH supposedly operated a plant in Bandera, Texas,. however, this was denied by an unidentified employee of RMH.

Full text of interview can be found in FD-302 of [redacted] dated May 19, 1978, pages 2 through 4, attached.

3.

[redacted]

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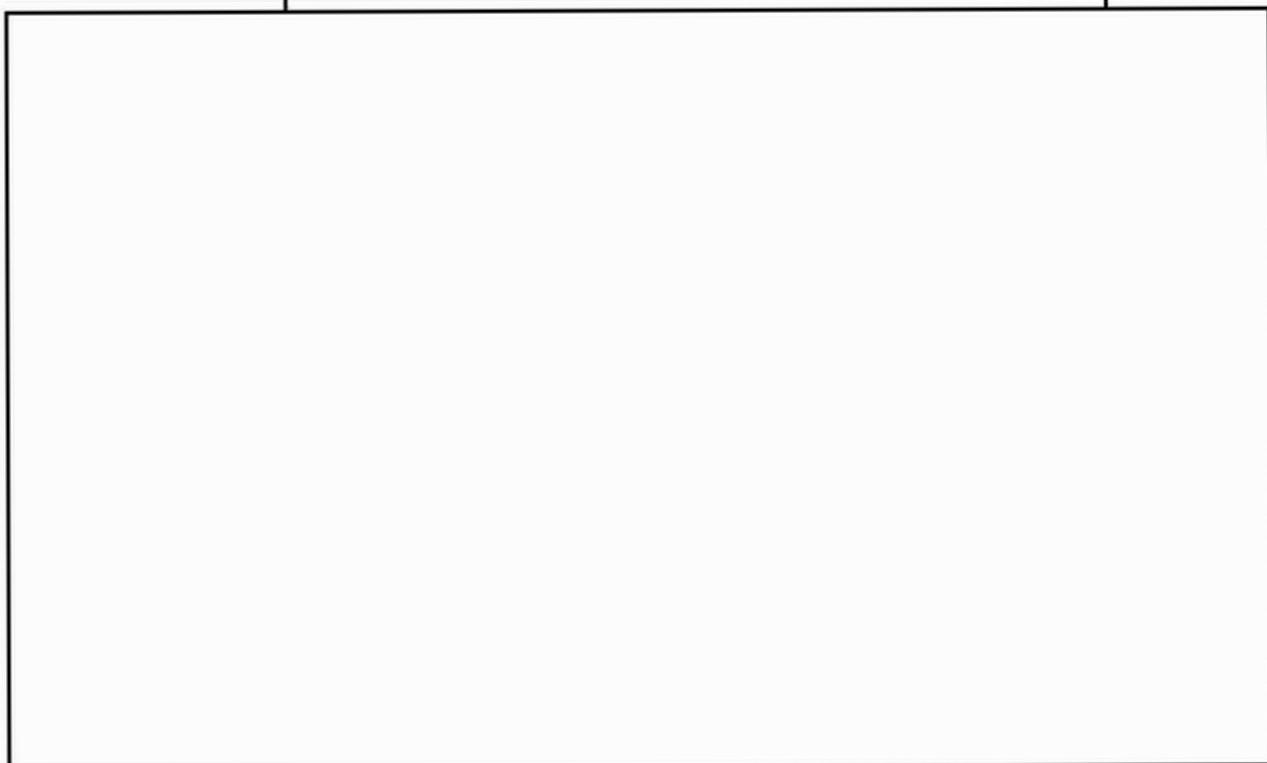
Can furnish information that [redacted]
[redacted] Bandera, Texas, [redacted] leased land to [redacted]
[redacted] El Dorado Chemical Company. Further,
that on November 25, 1975 [redacted] entered into a formal lease
agreement with EDC for rental [redacted] property for an annual
lease of \$1,500.

Full text of interview can be found in FD-302 of [redacted] dated May 19, 1978, and FD-302 of [redacted] dated January 19, 1979, pages 2 through 4 and 32 through 51, attached.

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4.

Referral/Direct



Full text of interview can be found in FD-302
of [redacted] dated July 31, 1978, pages 8 through 11, attached.

5.

[redacted]
Captain, USAF, Former Pricing Negotiator
McClellan, Air Force Base, California

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Can furnish information that he was pricing
negotiator for USAF contract F04699-76-90268 between El
Dorado Chemical Company (EDC) and the USAF, and that one of the
issues was transportation costs of chemicals from San Antonio,
Texas, to McClellan Air Force Base, California. [redacted]
advised him that an alkaline cleaner was manufactured in
Stockton, California, and that the plant in Stockton, California,
was a joint venture and that EDC would use the other company's
facility for a storage area only.

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Full text of interview can be found in FD-302
of [redacted] dated July 28, 1978, pages 5 through 7, attached.

6.



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Can furnish information that he formerly was employed as a driver for El Dorado Chemical Company (EDC) and that he transported SR51 from San Antonio, Texas, to McClellan AFB, California, and would always stop at North American Chemical Company, Stockton, California, where the concentrate he transported was unloaded and combined with other ingredients to expand the load. Further, on two occasions he hauled empty barrels from San Antonio, Texas, to Stockton, California, and usually he hauled 55-gallon drums of sludge from California to San Antonio, Texas, where he observed EDC personnel recycle the sludge.

[redacted] Full text of interview can be found in FD-302 of dated July 28, 1978, pages 5 through 7, attached.

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7.

[redacted]
[redacted] Region 9
Texas Air Control Board
6538 Centerview
San Antonio, Texas

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Can furnish information that Ron Jackson, County Attorney, Bandera, Texas, complained on August 1, 1977, that El Dorado Chemical Company (EDC) was operating a rust-resistant solvent still on the [redacted] ranch, Bandera, Texas., that was emitting a foul odor. It was determined the still at this facility was being operated by [redacted] who advised the still belonged to R. M. Hughes Company (RMH) who recycled a spent solvent utilized in cleaning aircraft fuel tanks from a company in California; reclaimed through distillation; and returned to the California company. Subsequent correspondence received by the TACB from [redacted] RMH stated the distillation still was a thiol purification plant that operated approximately four hours a day, two days a week, twenty weeks a year, and produced 500 pounds of product, 300 pounds of still residue,

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SA 206-2

and less than ten pounds of gas per day of operation.

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[redacted] further advised this unit was utilized to reclaim a solution of aeromatic thiols in hydrocarbon solvents. [redacted] opined EDC and RMH are one in the same in that the process utilized by both companies produce the exact same product.

Full text of interview can be found in FD-302
of [redacted] dated July 27, 1978, pages 18 through 21, attached.

8.

[redacted]
[redacted] El Dorado
Chemical Company (EDC)
333 Rhine Roade
New Braunfels, Texas

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Can furnish information that while employed by EDC he was aware of a government contract EDC had with the USAF. He observed sludge that was hauled from California to San Antonio, Texas, however, to the best of his knowledge, the sludge was not recycled. Chemicals were actually mixed on a ranch in the Boerne-Kerrville, Texas, area and then transported to EDC for further mixing prior to shipment to California.

Full text of interview can be found in FD-302
of [redacted] dated July 28, 1978, pages 5 through 7, attached.

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SA 206-2

EVIDENCE:

1. Copy of Articles of Incorporation of El Dorado Chemical Company, Inc., dated July 11, 1970.
2. Copy of Articles of Incorporation of R. M. Hughes, Inc., dated October 7, 1975.
3. Complete copy of Contract F04699-76-90268 with an effective date of June 10, 1976. Referral/Direct

Items 1 - 4 are being retained by the Federal Bureau of Investigation and will be released to proper authority upon request.

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FEDERAL BUREAU OF INVESTIGATION

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b7CDate of transcription 5/31/78

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[redacted] Special Agent, United States Air Force, Office of Special Investigations, Detachment 1016,, Kelly Air Force Base, Texas, made available a copy of an official United States Air Force, Office of Special Investigations, Report of Investigation, pertaining to preliminary investigation conducted by the United States Air Force, Office of Special Investigations, concerning the fraudulent submission of invoices by the R. M. Hughes Company, 614 Medina Street, San Antonio, Texas, to the United States Government. Pertinent portions of this report are summarized as follows:

On April 24, 1978, a review of a United States Air Force, Office of Special Investigations, investigative file pertaining to El Dorado Chemical Company, 6700 Lookout Road, San Antonio, Texas, disclosed that the R. M. Hughes Company had supplied chemicals to El Dorado Chemical Company and that the prices paid for these chemicals form part of the cost in pricing data utilized to negotiate a Government contract which El Dorado Chemical Company had with McClellan Air Force Base, California, for SR51 and GD500, which are used in the desealing operation for the F-111 Fighter/Bomber fuel tank project.

[redacted] Referral/Direct [redacted]

was told the reason El Dorado Chemical Company did not manufacture the chemicals themselves was that the Environmental Protection Agency had refused to allow El Dorado Chemical Company to manufacture the chemicals because of their odor. Purportedly, the

Investigation on 5/19/78 at San Antonio, Texas File # SA 46-3022

by SA [redacted] jm Date dictated 5/25/78

206-HQ-76-1X1 FDPS pgs 29

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

R. M. Hughes Company had an out-of-town plant where the chemicals were manufactured.

On May 11, 1978, the United States Air Force Office of Special Investigations developed information that the R. M. Hughes Company had provided fraudulent invoices to Mikelco, Inc., San Antonio, Texas, and had provided fraudulent and blank invoices to Commercial Overhaul Services.

[Redacted] Referral/Direct

On May 16, 1978, information was developed that the R. M. Hughes Company purportedly operated a plant in Bandera, Texas. However, when contacted, an unidentified employee of the R. M. Hughes Company stated that that company did not have a facility in Bandera, Texas.

On May 17, 1978, [Redacted] Deputy Chief, Bandera County Sheriff's Office, Bandera, Texas, advised Special Agents of the United States Air Force Office of Special Investigations that approximately three to four months previously he had received complaints concerning a truck operated by [Redacted] not further identified, of Bandera, Texas, which contained some type of chemical which was parked in town which emitted an extremely foul odor. It was subsequently learned that some type of chemical plant was being operated on a ranch owned by [Redacted] not further identified, located off [Redacted] near the [Redacted]. The Tax Assessor, Bandera County, Texas, attempted to survey the facilities for the purpose of levying taxes, but was barred from the premises by [Redacted] and the tax office for Bandera County, Texas, subsequently taxed [Redacted] at the maximum rate. [Redacted] pleaded his case stating that the land was owned by him but was leased to some company and based upon this information the tax issue was resolved.

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On May 17, 1978, [Redacted] Bandera County, Texas, advised that when [Redacted] first came to the tax office to plead his case, he claimed his land was leased to [Redacted]

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[redacted] the [redacted] of El Dorado Chemical Company, San Antonio, Texas. Later, due to complaints of offensive odors, this operation was closed down by the Texas Air Control Board, San Antonio, Texas, but was subsequently certified by the Texas Air Control Board as meeting minimum air pollution standards and had been reopened in the name of the R. M. Hughes Company, San Antonio, Texas.

On May 17, 1978, RON JACKSON, Bandera County attorney, Bandera, Texas, advised that [redacted] Texas Air Control Board, San Antonio, Texas, had advised him that El Dorado Chemical Company and the R. M. Hughes Company are one and the same company.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/2/781

[redacted] Special Agent, United States Air Force, Office of Special Investigations, Base Investigative Detachment, Randolph Air Force Base, Texas, advised that the United States Air Force, Office of Special Investigations, District Office 19, Travis Air Force Base, California, initiated an investigation during March, 1978, of the Eldorado Chemical Company, Inc., 6700 Lookout Road, San Antonio, Texas, for possible violation of the Truth in Negotiations Act (defective pricing).

During February, 1978, [redacted]

[redacted] telephonically contacted the United States AIR FORCE, Office of Special Investigations, Mc Clellan Air Force Base, California, and advised he had been a driver for Eldorado Chemical Company and in this position transported SR51 (a chemical utilized in the desealing process for F-111 Fighter/Bomber fuel tank project for which Eldorado Chemical Company, Inc., had a contract with the United States Air Force) and that when he would transport this chemical from San Antonio to California, he would always stop at the North American Chemical Company, Stockton, California, where the concentrate he transported was unloaded and combined with other ingredients to expand the load.

On March 14, 1978, [redacted] Captain, United States Air Force, former pricing negotiator for Contract F04699-76-90268, the contract between the United States Air Force and Eldorado Chemical Company, Inc., advised that during negotiations for supra contract, one of the issues was the transportation cost of the chemicals from San Antonio, Texas, to Mc Clellan Air Force Base, California. At the time of these negotiations, [redacted], Eldorado Chemical Company, advised that some chemicals were manufactured in the Stockton, California, plant, not further identified, and identified these chemicals as GD500 (an alkaline cleaner). [redacted] did not know the exact quantity being produced in the plant at Stockton, California, and the transportation charge of \$.53 per gallon was agreed upon based on the fact

Investigation on 7/28/78 at Randolph Air Force Base, Texas File # SA 46-3022

by SA [redacted]

rmm

Date dictated 8/1/78

~~that "most shipments of chemicals have been from San Antonio."~~
~~[redacted] further advised [redacted] that the plant in Stockton,~~
~~California, was a joint venture with another company, not~~
~~further identified, and that Eldorado Chemical Company, Inc.,~~
~~would use the other company facility for a storage area only.~~

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On April 4 and 5, 1978, [redacted] as interviewed by U.S. Air Force, Office of Special Investigations, Special Agents at Converse, Texas, and advised that while employed as a driver with Eldorado Chemical Company, he delivered SR51, SR51A, liquid soap, PR3400, and filter powder to U.S. Air Force and U.S. Army installations. He stated that on seven occasions he hauled 100 bags of filter powder which were delivered to North American Chemical Company, Stockton, California. Prior to proceeding to Mc Clellan Air Force Base, California, North American Chemical Company personnel would "top off" his load by adding 55-gallon drums of SR51 or SR51A. Sometimes, he had to wait as much as eight hours in Stockton, California, while the plant ran off a batch of the solution before he could continue his trip. Twice, he hauled empty barrels from San Antonio, Texas, to Stockton, California. Usually, he hauled 55-gallon drums of sludge from California to San Antonio, Texas, where he observed Eldorado Chemical Company, Inc., personnel recycle the sludge.

Referral/Direct

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On May 15, 1978, [redacted]

[redacted] advised Special Agents of the United States Air Force, Office of Special Investigations, that he was a former employee of Eldorado Chemical Company, Inc. During the period of his employment, he worked primarily as a dock worker and was aware of a Government contract that Eldorado Chemical Company, Inc., had with the United States Air Force. He observed sludge being hauled back from California which was unloaded at Eldorado Chemical Company, Inc.; however, to the best of his knowledge, the sludge was not recycled. He understood the company initially disposed of the sludge in California but for some reason stopped disposing of it in California and started bringing it to San Antonio, Texas. To his knowledge, the sludge was stored in 55-gallon drums behind the building occupied by Eldorado Chemical Company, Inc. [redacted] added that the chemicals provided the government were actually mixed on a ranch in a rural area located somewhere in the Boerne-Kerrville, Texas, area and that they were later transported to the San Antonio plant of Eldorado Chemical Company, Inc., for further mixing and/or preparation for shipment to California.

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FEDERAL BUREAU OF INVESTIGATION

1Date of transcription 8/2/78b6
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[redacted] Region 9,
 Texas Air Control Board, 4538 Centerview, made available official records of the Texas Air Control Board regarding R. M. Hughes and Company, Incorporated and El Dorado Chemical Company. A review of these records disclose the following pertinent information:

On August 1, 1977, the Texas Air Control Board received a complaint from RON JACKSON, County Attorney, Bandera, Texas, telephone number 796-4202, claiming that El Dorado Chemical Company, 1701 North St. Marys, San Antonio, Texas was operating a rust-resistant solvent still on the B. C. Fleenor Ranch, located eight miles south of Bandera, Texas that was emitting a foul odor.

Subsequent investigation by the Texas Air Control Board determined that the plant in question was being operated by [redacted] telephone number [redacted]

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[redacted] The source of the odor emissions was located about one mile northeast of the ranch on a dirt road. A small chemical operation had been constructed which consisted of a distillation vessel, a condensing unit, an operation shack, and a large collection of 50 gallon barrels. Below the plant in a gully a retaining dam had been constructed to impound a tar-like waste material. It appeared this plant had been in operation for several months.

[redacted] was contacted and advised that the plant belonged to the R. M. Hughes Company in San Antonio, Texas. He further related that the company receives a spent solvent utilized in cleaning aircraft fuel tanks from a company in California and that this material is reclaimed through distillation and returned to the California Company.

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At that time, it was determined by Texas Air Control Board that there was some connection between supra operation in the El Dorado Chemical Company located in San Antonio who conducted a pilot project in 1975, which possibly evolved into the present operation.

Investigation on 7/27/78 at San Antonio, Texas File # SA 46-3022

by - SA [redacted]

sjh

Date dictated

7/28/78

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[redacted], R. M. Hughes and Company, Incorporated, was contacted and informed that his was in violation of regulation VI and on August 16, 1977, the R. M. Hughes and Company, Incorporated was cited by the Texas Air Control Board for operating a small chemical plant in Bandera, Texas which was not in conformance with Texas clean air standards.

On August 17, 1977, [redacted] sent a letter to [redacted] stating the R. M. Hughes and Company, Incorporated would not continue operations on the [redacted] Ranch until they were in compliance with Texas Air Control Board rules. A subsequent letter to the Texas Air Control Board by [redacted] enclosed various forms required for certification by the Texas Air Control Board for operation of the distillation unit on the [redacted] Ranch, Bandera, Texas. These forms indicated the distillation still operations were conducted approximately four hours a day, two days a week, 20 weeks a year and referred to the distillation still as a Thiol Purification Plant. This letter further indicated this plant yielded approximately 500 pounds of product, 300 pounds of still residue, and less than 10 pounds of gases absorbed in lime water per day of operation. It further indicated this distillation unit was utilized to reclaim a solution of aromatic Thiols in hydrocarbon solvents.

On November 28, 1977, the Texas Air Control Board issued permit C-5821 for distillation unit, Bandera, Texas to the R.M. Hughes and Company, Incorporated for operation of a plant on a leased site on a ranch located eight miles south of Bandera, Texas. The permit consisted of a distillation unit condenser, three collectors, and eight scrubbers and indicated that the raw material utilized in the process will be shipped to the plant via truck. He further indicated that one batch (two drums or 110 gallons) will be pumped into the distillation unit that is heated by 30 gallons butane per batch approximately 30 gallons of asphaltic residue

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SA 46-3022

are drained from the bottom of the distillation unit and 80 gallons of product are condensed and collected in three receiving drums. The thiol solutions are later pumped out into 55-gallon drums for shipment.

Records of the Texas Air Control Board reflect that El Dorado Chemical Company was built in March, 1969 and was located at 6700 Lookout Road, San Antonio, Texas. The plant consisted of a large warehouse type building with several small storage tanks located within the building. The output of the plant consisted of small batches of five-gallon cans or 50-gallon drums of solvents or detergents utilized in the aircraft industry. These solvents or detergents were mixed to specification and canned or drummed at the plants. One of the products produced was a solvent for the cleaning of fuel tanks of aircrafts. A component of this solvent, a di-phenyl sulfide, is unobtainable. A source of this product is a di-phenyl oil purchased from Merichem of Houston, Texas.

On February 12, 1975, an experimental distillation of a batch of di-phenyl oil was started to secure a sample from the Merichem material. Records of the Texas Air Control Board reflect that sufficient di-sulfide was produced to carry out an evaluation test at General Dynamics Company on March 3, 1975. If the test proved that this is a source for this product, then an application would be made to the Texas Air Control Board for a construction permit for full-size still for the manufacturing of the product.

On February 17, 1975, [redacted]
El Dorado Chemical Company, 6700 LOOKOUT ROAD, San Antonio,
Texas, telephone numbers [redacted] was cited
by the Texas Air Control Board for burning waste material.
Records of the Texas Air Control Board indicate that the
building occupied by El Dorado Chemical Company burned down
in March, 1975.

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On May 17, 1977, [redacted] and [redacted] El Dorado Chemical Company, telephone number [redacted] advised that Texas Air Control Board that El Dorado Chemical Company once or twice a month transfers Mercaptans (a cleaning agent) into holding tanks which causes odors. There is no further information reflected in official records of the Texas Air Control Board regarding either this operation or the El Dorado Chemical Company.

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[redacted] advised, that in his opinion, the R. M. Hughes and Company, Incorporated and the El Dorado Chemical Company are one and the same. He advised that both operations were similar in nature, secretive, and when the operation at the [redacted] Ranch in Bandera, Texas was first investigated the name El Dorado Chemical Company came up as being associated with the operation. He advised that both processes utilized by the R. M. Hughes and Company, Incorporated and El Dorado Chemical Company are identical and both produce the exact same product. He advised the operation consisted of bring in a spent product from wing-tank solvents from California, cleaning it up, and then reselling it. He advised the operation at the [redacted] Ranch in Bandera, Texas resembles a "Kentucky Still." From his observations he believes the R. M. Hughes and Company, Incorporated and El Dorado Chemical Company are one and the same or at least have a direct relationship or tie-into each other.

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 10/17/78

[redacted] voluntarily appeared in the offices of the San Antonio Division of the Federal Bureau of Investigation where he was interviewed.

He was advised of the identity of the interviewing agent, and that the purpose of the interview was to determine his participation in, or his knowledge of, fraud submission of invoices by the R. M. Hughes Company, Incorporated to the Eldorado Chemical Company of San Antonio, Texas.

[redacted] advised that he is [redacted] for Eldorado Chemical Company of San Antonio, Texas, [redacted] distillation unit on the [redacted] ranch in Bandera County for the R. M. H. [redacted] and individual identified as [redacted] how to operate this distillation unit. He advised that [redacted] and himself had formerly worked together at Gary Aircraft Company of Hondo, Texas.

[redacted] advised that R. M. Hughes Company, Incorporated is the sole source of a chemical identified as thioacten, which is a primary component in a desealing chemical sold by the Eldorado Chemical Company to the United States Air Force under United States Government contract.

He advised that R. M. Hughes Company, Incorporated manufactures this chemical because it is too expensive for Eldorado Chemical Company to manufacture themselves because of clean air standards imposed by the Texas Air Control Board.

He added that [redacted] is not an employee of Eldorado Chemical Company.

[redacted] advised that the desealing chemical manufactured by Eldorado Chemical Company was previously shipped to the North American Chemical Company of Stockton, California, where it was expanded and thereafter transported to McClellan Air Force Base, California. He advised that after the product

Investigation on 10/4/78 at San Antonio, Texas File # SA 206-2

by SA [redacted] sjh Date dictated 10/11/78

is utilized in a United States Air Force Wing Tank Desealing Program, it is shipped back to San Antonio, Texas where it is recycled at ~~the~~ Ranch by R. M. Hughes Company, Incorporated and resold to the United States Air Force.

[redacted] denied any knowledge of the possible violation of the truth in Negotiations Act (defective pricing) by Eldorado Chemical Company involving their contract with the United States Air Force at McClellan Air Force Base, California.

The following physical description was obtained through observation and interview:

Name
Date of Birth
Place of Birth
Race
Sex
Hair

Eyes
Height
Weight
Scars and Marks

Prior Arrests
Military Service
Highest Rank Held
Period of Service
Discharge
Marital Status
Wife
Residence

Home Telephone No.
Employment

Work Telephone No.
Driver's License No.
Social Security No.

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[redacted] was advised that under the provisions of the Privacy Act of 1974 concerning Social Security Account Numbers (SSAN), disclosure of his SSAN was not mandatory and that his SSAN could be utilized by the FBI to conduct records checks. He was further advised that failure to furnish his SSAN would not deny him of any right, benefit, or privilege.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/16/781

[redacted] was interviewed in the offices of his attorney, [redacted] 1800 Plaza-West, Suite 100, 1800 Northeast Loop 410, San Antonio, Texas.

He was advised of the identity of the interviewing Agent and that the purpose of the interview was to determine his participation in, or his knowledge of, the submission of fraudulent invoices from the R. M. Hughes Company, Incorporated, to the El Dorado Chemical Company, Incorporated, 6700 Lookout Road, San Antonio, Texas.

[redacted] advised that [redacted] the R. M. Hughes Company, Incorporated, in approximately the spring of 1974 for approximately \$69,000 [redacted] of San Antonio, Texas. At the time of purchase, [redacted] was selected as the original [redacted] was [redacted] and [redacted] was [redacted] Later, [redacted] became [redacted] with [redacted] serving as [redacted] The company has been located at 614 South Medina, San Antonio, Texas, since [redacted] purchased it.

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Approximately two years ago, [redacted] and [redacted] entered into an agreement for the R. M. Hughes Company, Incorporated, to furnish thioacten to El Dorado Chemical Company as the single source of the chemical. Thioacten is the primary chemical element for a chemical compound used for desealing. El Dorado Chemical Company had a distillation unit established at the [redacted] Ranch in Bandera, Texas, but, to [redacted] knowledge, this distillation unit was inoperative at the time he entered into an agreement with [redacted] to furnish thioacten. He related that [redacted] and [redacted], [redacted], had formerly operated the distillation unit when it was set up in Hondo, Texas, near the airport. The distillation unit has in effect become the property of R. M. Hughes Company, Incorporated, and after entering into an agreement with [redacted] to produce thioacten, [redacted] redesigned the distillation unit. The [redacted] boys continued to operate the distillation unit and are paid by check per gallon produced as contract labor by R. M. Hughes Company, Incorporated. [redacted] advised that his company only produces thioacten for El Dorado Chemical Company.

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Investigation on 10/4/78 at San Antonio, Texas File # SA 206-2

by SA [redacted] rmm Date dictated 10/10/78

[redacted] stated the R. M. Hughes Company, Incorporated, does not receive a spent solvent utilized in the cleaning of aircraft fuel tanks from a company in California that is subsequently recycled through distillation and returned to the California company.

He advised that in August of 1977 he sent a letter to the Texas Air Control Board with documentation required for certification by the Texas Air Control Board for operation of the distillation unit in Bandera, Texas. In this correspondence, he indicated that the distillation unit was utilized to reclaim a solution of aromatic thiols in hydrocarbon solvents. He advised that this was an exaggeration on his part at the time, but such information was required in order to be certified by the Texas Air Control Board. He reiterated that no spent solvent utilized by El Dorado Chemical Company is reclaimed through distillation utilizing the distillation unit in Bandera, Texas.

He stated that the R. M. Hughes Company, Incorporated, and the El Dorado Chemical Company are not one in the same, nor do they have a direct relationship or tie-in with each other.

Thioacten is only furnished to El Dorado Chemical Company in San Antonio, Texas, and the R. M. Hughes Company, Incorporated, does not ship thioacten to any other source or location.

He added that although the distillation unit in Bandera, Texas, was in operation at the time he took over operation of it, any product produced by the distillation unit at that time was of an inferior quality. He was told by [redacted] of El Dorado Chemical Company, that he had tried to make a concentrate for El Dorado Chemical Company utilizing the distillation unit, however, the name of the concentrate was not mentioned.

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R. M. Hughes Company, Incorporated, produces approximately 20 drums of thioacten per month for El Dorado Chemical Company which is sold for \$1,764 per drum. All billing to El Dorado Chemical Company refers to one purchase order, number 6162, dated June 16, 1976, and R. M. Hughes Company, Incorporated, utilizes separate invoices for their thioacten account with El Dorado Chemical Company; hence, the invoice numbers utilized are insignificant as these invoices are only utilized with the El Dorado Chemical Company thioacten account and not for accounts with any other companies.

The R. M. Hughes Company, Incorporated, manufactures thioacten. They do not purchase it from another source and then sell it to El Dorado Chemical Company for an inflated cost.

[redacted] advised he had nothing to do with a fire at El Dorado Chemical Company in March, 1975, nor does he have any information concerning that particular fire.

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[redacted] denied the R. M. Hughes company ever submitted fraudulent, fictitious, or inflated invoices to El Dorado Chemical Company concerning thioacten. He further advised that all shipments as recorded in official records were actually sent to El Dorado Chemical Company and that no shipments were overstated.

The following physical description was obtained through observation and interview:

Race:
Sex:
Date of birth:
Place of birth:
Social Security
account number:
Height:
Weight:
Hair:
Eyes:
Scars, marks:

Arrests:

Military service:

Marital Status:
Spouse:
Residence:

Employment:

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Texas Driver's
License:



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FEDERAL BUREAU OF INVESTIGATION

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b7CDate of transcription 12/27/78

[redacted] voluntarily appeared in the San Antonio offices of the Federal Bureau of Investigation (FBI) where he was interviewed.

He was advised of the identity of the interviewing Agent and that the purpose of the interview was to determine his participation in, or his knowledge of, the submission of fraudulent invoices from the R. M. Hughes Company, Incorporated, to the El Dorado Chemical Company, Incorporated, 6700 Lookout Road, San Antonio, Texas, and his participation in the possible submission of defective pricing data to the United States Air Force (USAF) in violation of the Truth and Negotiations Act as it pertains to contracts that the El Dorado Chemical Company, Incorporated, of San Antonio, Texas, has with the USAF.

Present throughout the interview was [redacted] attorney, [redacted] 437 McCarty Road, San Antonio, Texas.

[redacted] under oath, advised that El Dorado Chemical Company, Incorporated, is known in the trade as a compounder and as such purchases chemicals from other companies and thereafter mixes them together and sells a finished product. Accordingly, El Dorado Chemical Company, Incorporated, purchases a chemical, known as thioacten, from the R. M. Hughes Company, Incorporated, and as such R. M. Hughes Company, Incorporated, is a supplier not a subcontractor.

El Dorado Chemical Company, Incorporated, formerly operated a Distillation Unit in Hondo, Texas, which was later moved to the [redacted] Ranch in Bandera, Texas. While this Unit was operational in Hondo, Texas, it was operated by [redacted] however, at no time was [redacted] considered to be an employee of El Dorado Chemical Company, Incorporated. During the period that El Dorado Chemical Company, Incorporated, had contracts with the USAF to furnish chemicals in a desealing operation for the F-111 fighter/bomber fuel tank project at Mc Clellan Air Force Base (AFB), California. This Distillation Unit located at the [redacted] Ranch in Bandera, Texas, was operational when established by El Dorado Chemical Company, Incorporated, however, no thioacten was commercially produced at this location which was utilized in

Investigation on 12/15/78 at San Antonio, Texas File # San Antonio 206-2

by SA [redacted] mmk Date dictated 12/21/78

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support of El Dorado Chemical Company, Incorporated's contracts with the USAF. This Unit was subsequently turned over to the R. M. Hughes Company, Incorporated, who thereafter redesigned it and it is presently from this facility that R. M. Hughes Company, Incorporated, commercially produces thioacten which is purchased by El Dorado Chemical Company, Incorporated, in support of its contracts with the USAF.

Shipments of chemicals from El Dorado Chemical Company, Incorporated, in San Antonio, Texas, which were transported to California were expanded in Stockton, California, at North American Chemical Company prior to their being delivered to Mc Clellan AFB, California. This was common knowledge of the USAF according to [redacted] and the transportation charge of \$.53 per gallon was agreed upon based upon the fact that most of the shipments of chemicals were made from San Antonio, Texas.

[redacted] advised that no empty 55 gallon drums were transported from San Antonio, Texas to California.

Sludge was and is being returned from California to San Antonio, Texas where it is being recycled on the [redacted] Ranch in Bandera, Texas by the R. M. Hughes Company, Incorporated. [redacted] advised that this was being done with the knowledge of the USAF.

[redacted] advised that purchase order 6162, dated June 16, 1976, was issued to the R. M. Hughes Company, Incorporated, based on the anticipated needs of the contract that El Dorado Chemical Company, Incorporated, had with the USAF at Mc Clellan AFB, California, and as the contract was expanded no amended purchase order was issued and the El Dorado Chemical Company, Incorporated continued to order chemicals from R. M. Hughes Company, Incorporated, based on purchase order 6162.

[redacted] advised that El Dorado Chemical Company, Incorporated, did re-use 55 gallon drums as well as recycle the product, known as SR51 and SR51A. The costing data [redacted] furnished to the USAF was based on the cost of new chemicals not recycled chemicals.

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Based upon the complexities of this investigation in the need for specific information, it was agreed that the interview would be terminated and upon checking records available at El Dorado Chemical Company, Incorporated, that the interview would be continued at a later date. Accordingly, the interview was terminated.

The following physical description was obtained from observation and interview:

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Name
Also Known As
Date of Birth
Place of Birth
Race
Sex
Hair
Eyes
Height
Weight
Scars and Marks
Prior Military Service
Residence

Telephone Number
Employment

Texas Drivers
License Number

Social Security
Account Number

[redacted] was advised that under the provisions of the Privacy Act of 1974 concerning Social Security Account Numbers (SSAN), disclosure of his SSAN was not mandatory and that his SSAN could be utilized by the FBI to conduct records checks. He was further advised that failure to furnish his SSAN would not deny him of any right, benefit, or privilege.

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 2/27/79b6
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[redacted] voluntarily appeared in the San Antonio Office of the Federal Bureau of Investigation where he was interviewed.

He was advised of the identity of the interviewing Agent and that the purpose of the interview was to determine his participation in, or his knowledge of, the submission of fraudulent invoices from the R. M. Hughes Company, Incorporated (RMHC) to the El Dorado Chemical Company, Incorporated, 6700 Lookout Road, San Antonio, Texas, (EDCC) and his participation in the possible submission of defective pricing data to the United States Air Force (USAF) in violation of the Truth In Negotiations Act as it pertains to contracts that EDCC has with the USAF.

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Present throughout the interview was [redacted] attorney, [redacted] 437 McCarty Road, San Antonio, Texas, and his [redacted] Alamo Savings Tower, 901 Northeast Loop 410, San Antonio, Texas.

[redacted] under oath, advised that EDCC has a long involvement in the desealing of aircraft fuel tanks and the compounding of desealing chemicals.

In 1973, EDCC learned that General Dynamics Corporation (GD) was exploring the possibilities of desealing the fuel tanks of F-111 aircraft. At that time EDCC was supplying all desealing materials for the desealing of all USAF C-41 aircraft being desealed and resealed and as such, EDCC was interested in the F-111 aircraft program and felt GD would be interested in what EDCC was able to offer. In the first contact with GD, EDCC learned that the F-111 aircraft had characteristics that would require a different approach to formulating an acceptable desealing material. The type of sealant that EDCC was currently manufacturing consisted primarily of mercaptan (distilled) and a chlorinated solvent. It was determined that this material could not be utilized on the F-111 aircraft as no chlorinated solvents were allowed.

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Investigation on 1/19/79 at San Antonio, Texas File # San Antonio 206-2

by VSA [redacted] jm Date dictated 2/23/79

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EDCC's initial approach to making an acceptable material for the F-111 aircraft was the use of EDCC's on hand mercaptan and a non-chlorinated solvent. EDCC was advised that the performance of the chemical was promising but would not meet the necessary corrosion requirements. A number of variations of the formulation varying the corrosion inhibitors were made, however, no inhibitor was found to correct the corrosion problem. EDCC thereafter contacted every company they were aware of that manufactured mercaptan for samples of their products and with the samples received and the mercaptan EDCC had in stock, EDCC manufactured a number of varied formulations. It was determined that desealant made with the Jefferson Lake Sulphur Company (JLSC) mercaptan mixture would meet the corrosion requirements, however, after attempting to contact the Jefferson Lake Sulphur Company to determine availability of this material, it was discovered that JLSC was no longer in business. Following additional research EDCC was able to nearly duplicate the JLSC material in EDCC laboratories. The samples of desealant made with JLSC material and EDCC manufactured material were tested during 1974 and both materials passed corrosion requirements. One important finding in all of the testing of mercaptans and specifically one component of the mercaptans used was that desealants made with thiophenol worked as well as those made with mercaptan mixture, but the longevity of the thiophenol was considerably shorter and the thiophenol required much more additive materials to keep it performing long enough to effect a complete deseal. This was due to the rate of air oxidation of the active materials.

Knowing that the mercaptan mixture from the JLSC was not available, EDCC did not make any SR-51 (EDCC name for sealant remover) completely with the JLSC material. The JLSC material was used up in conjunction with material made by the EDCC method. The supply of mercaptan that EDCC had in stock proved invaluable in accomplishing the deseal of the early aircraft in support of a contract EDCC had with the USAF.

EDCC purchased thiophenol from the only available source, Aldrich Chemical Company, Incorporated, 940 West St. Paul Avenue, Milwaukee, Wisconsin. The material purchased from Aldrich Chemical Company was manufactured in Japan and EDCC believed that a dependable supply could not be assured.

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The cost of thiophenol from the Aldrich Chemical Company was \$3.86 per pound plus freight from port of entry.

On September 15, 1975, EDCC furnished a letter addressed to contracts McClellan Air Force Base, pertinent portion of which are summarized as follows:

The contract proposal was based on desealing two aircraft per week and was based on a fixed priced per aircraft bid. This per aircraft bid covered the following: "Technical Service. EDCC will assign a service manager for this project to coordinate manning, scheduling and contract performance with the government representative. A service engineer will be assigned for each workshift on a seven day work week. Equipment. EDCC will furnish two each deseal units, two sets of manifolds complete with spray heads, suction hoses, supply hoses, return hoses and related equipment required for desealing. Maintenance of equipment and replacement of expendable materials will be the responsibility of EDCC. Chemicals. EDCC will supply all required SR-51 desealant, SR-51-A desealant rejuvenator and alkaline cleaner for washing tanks after deseal machine run. The desealant will be analyzed after each aircraft desealed and complete charge of material will be replaced when desealant contamination has reached a level where optimum performance is not being realized. Removal and disposal of the contaminated desealant will be the responsibility of EDCC.

EDCC charge per aircraft for the above will be \$11,018.52 with a one time transportation charge of \$3,600 to cover shipment of equipment to Sacramento and its return to San Antonio."

In October, 1975, EDCC entered into negotiations with RMHC to set up and manufacture the required material. It was planned that RMHC would be able to get into production and short order and supply EDCC in a timely manner, thus relieving EDCC of the responsibility of making the needed material in a haphazard, round-the-clock basis. [redacted] advised the process utilized at the time was dangerous due to generation of deadly gases and was an air pollution problem due to the persistent bad odor.

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EDCC purchased a still from a [redacted]
Quality Department, Defense Contract Administration, 615 East Houston, San Antonio, Texas, and modified it to make the early

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runs of mercaptan mixture. This equipment was primitive and made the material expensive due to the man hours required and the constant repair of equipment as well as subjecting the people to extreme danger from escaping fumes of a hazardous nature. After several run at EDCC the Live Oak, Texas, Police Department complained and ordered EDCC to terminate operations. Equipment associated with this process was then transported to Hondo, Texas, where the same problem soon developed. EDCC was ordered to remove the equipment from Hondo, Texas, by Gary Aircraft Company on November 12, 1975. The equipment was moved to the [redacted] ranch, Bandera, Texas. On November 25, 1975, EDCC entered into a lease agreement with the [redacted] ranch owned and/or operated by [redacted] and [redacted] wherein a tract of land large enough for the establishment and operation of a plant was agreed to for an annual lease of \$1,500.

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On October 20, 1975, EDCC entered into a contract with RMHC utilizing EDCC purchase order number 75-10201 which called for an estimated 21 fifty-five gallon drums or 480 pounds of thiophenol per month at a price of \$3.60 per pound. This purchase order covered RMHC supplying EDCC's thiophenol requirement which was established as a minimum of 3,840 pounds at time of signing with an estimated 21 drums per month beginning January 1, 1976, through June 30, 1976. Purchase order number 75-10201 further stipulated that all material would not be received or scheduled for payment until all quality control tests were completed. It was further stipulated that in consideration of the cost expended by RMHC, EDCC would offer all material requirements to RMHC as long as RMHC could supply the quality and quantity needed. EDCC purchase order number 6162 dated June 16, 1976, placed an order for 63 drums of thiol distillate at a unit cost of \$3.60 per pound with 490 pounds constituting one 55-gallon drum at a total cost of \$111,132 in support of contract number F04699-76-90268. Shipment requested was 23 drums immediately, 20 drums by July 16, 1976, and 20 drums by August 16, 1976. EDCC purchase order number 6162 (amended) dated July 21, 1976, ordered 49 drums of thiol distillate at 490 pounds per drum at a unit price of \$3.52 per pound for a total purchase price of \$108,662.40 from RMHC in support of contract F04699-76-90268. EDCC purchase order number 6162 (amendment number two) ordered an indefinite quantity of thiol distillate at 490 pounds per drum at a unit price of \$3.52 per pound in support of fiscal year 1977, F-111 program.

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[redacted] advised that R. M. HUGHES was initially reluctant to furnish EDCC with thiol distillate because of the problem with air pollution and it was because of this that EDCC originally leased a site on the [redacted] ranch on November 25, 1975. Shortly thereafter, RMHC began production and EDCC agreed to turn over the leased site on the [redacted] ranch to RMHC and allow RMHC to lease the site directly when the lease came up for renewal. It was shortly after the leasing of a site on the [redacted] ranch that the distillation unit was moved from Hondo, Texas, to the [redacted] ranch. At this time, EDCC offered all help to RMHC to assist them in the efficient production of thiol distillate and the first commercially produced batch of thiol distillate was produced around March or April, 1976, by RMHC.

During this period, EDCC was called upon on a number of occasions to get needed supplies and other things to keep the process going. In the beginning, EDCC experienced a degree of uncertainty since they operated not knowing in advance how long they would be the contractor to the USAF since the aircraft being desealed were contracted on a piecemeal basis. EDCC also operated under the belief that the USAF was negotiating with other chemical companies, and, in fact, were notified by the USAF that the USAF was evaluating other bids as well as considering a mechanical process instead of utilizing chemicals. Accordingly, EDCC did not commit itself for long term requirements of the mercaptan mixture and an additional problem was that EDCC had limited capital and experienced slow payment by the USAF, which in turn necessitated that EDCC was slow in their payments to RMHC. These problems subsequently worked themselves out and during the past two contracts that EDCC has had with the USAF, EDCC has received good service from RMHC.

A letter of contract was received from the USAF for desealing three aircraft at McClellan Air Force Base, California, beginning November 18, 1975. These aircraft were desealed using a chemical blend of JLSC mercaptan, EDCC manufactured mercaptan, and thiophenol. The contract was later extended to 24 aircraft and finally ended with 38 aircraft. Materials utilized in desealing these aircraft shifted from materials in stock to RMHC produced thioacten (RMHC's name for the mercaptan mixture) and purchases of other ingredients of SR-51 from a variety of suppliers.

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[redacted] advised the problems were many during this period, some of which were constant pressure on RMHC to produce enough quantities of thioacten, odor problems in the production of SR-51 in San Antonio, Texas, shipping enough material to McClellan Air Force Base, California, odor problems from leaking drums during shipment, and odor problems at McClellan Air Force Base, California. Attempts were made to reduce cost by reusing material, adding thiophenol to used materials, and utilizing reconditioned drums. The reuse of chemicals proved uneconomical due to rapid oxidation of active ingredients during use. Using reconditioned drums had to be discontinued because only heavy gauge drums in good shape could be utilized due to the problems resulting from leaking drums during shipment. [redacted] advised the transfer of mercaptans was difficult due to odor and safety hazards and where possible, EDCC waited until it rained for the manufacture of SR-51. The San Antonio Air Pollution Control Board made a series of tests at EDCC and found the level of chemicals in the air to be non-hazardous to the community, however, [redacted] advised that even when EDCC was not manufacturing chemicals, there was an odor continuously present for which EDCC was in danger of a nuisance injunction.

[redacted] stated that it was not until EDCC had completed the first contract that he became aware that he did not have complete freedom to utilize any method to perform the work because it was understood that the work was being done on a per aircraft basis and offered as an example that there was no requirement as to the receiving of materials at McClellan Air Force Base, Texas, and EDCC ended up shipping its materials to itself at McClellan Air Force Base, California.

North American Chemical Company (NACC), Stockton, California, came into existence because for several years EDCC had considered opening a plant in California to generate sales on the west coast, but had taken no action due to EDCC's lack of sales on a previous occasion when EDCC had opened a plant in Wichita, Kansas. [redacted] advised that someone who has a stake in the business is necessary to start a business from nothing and without a lot of outside support, EDCC did not have the time to do it themselves. [redacted] a [redacted] b6 b7C discussions during 1975 and 1976 with [redacted] a [redacted] with experience in manufacturing [redacted] les of EDCC's type of product, resulted in the idea of [redacted] starting a new corporation in California in which EDCC would have a non-controlling interest for the purpose of manufacturing and

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selling products which would not compete with EDCC's existing products. The need to solve pollution problems, the reduction in freight cost, and the need for someplace to store waste materials generated at McClellan Air Force Base, California, prompted EDCC to accelerate their plans with [redacted] since the new company could lease space to EDCC and manufacture for EDCC under license.

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A building was leased July 15, 1976, for NACC, but soon thereafter, [redacted] changed his mind and went to work for a chemical company in competition with EDCC shortly after the corporation was formed. EDCC, thereafter, took over operation of NACC and production of some commercial products began at NACC in early 1977 and production of the first materials utilized at McClellan Air Force Base, California, began in mid 1977.

[redacted] advised that during the first contract with the USAF at McClellan Air Force Base, California, EDCC felt it was necessary to make every attempt to protect the details of the manufacture of the materials produced by EDCC from disclosure since the government has a reputation for failing to protect confidential information concerning the composition and manufacture of chemicals. He advised that EDCC was required to complete a material safety data sheet for tox logical purposes. This sheet required the listing of all hazardous materials, and therefore, served as a rough approximation of EDCC's formulas. [redacted] advised that copies of this material safety data sheet were available at McClellan Air Force Base, California, and were, in fact, published as part of the second contract EDCC had with the USAF. [redacted] opined that purchase of materials from RMHC protected EDCC from disclosure of EDCC's knowledge of the distillation process.

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[redacted] advised that during the last phases of the first contract EDCC had with the USAF and the beginning of the second contract, he realized that the USAF expected more accountability from EDCC than EDCC had been advised of in the beginning of negotiations. The second contract number F04699-76-90268 was for 24 aircraft and work began on July 6, 1976, without any contract. A letter contract for 24 aircraft was received by EDCC on September 9, 1976, however, negotiations on the contract did not begin until April, 1977, and the contract was signed on July 6, 1977, for 119 aircraft.

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[redacted] advised that it was not until July 28, 1976, that EDCC was informed by the USAF that the proper procedure for EDCC would be to ship materials through the receiving department at McClellan Air Force Base, California, rather than to EDCC's work site on McClellan Air Force Base, California, however, it was necessary on occasion to bring materials on McClellan Air Force Base, California, after the receiving department's normal hours of operation. Discussion of this matter continued through the second contract and EDCC was advised that it would only be paid for material shipped through the receiving department on McClellan Air Force Base, California.

On April 13, 1977, [redacted] discussed negotiations for finalizing the second contract with Captain [redacted] [redacted], Captain, United States Air Force, former pricing negotiator for contract F04699-76-90268) [redacted] advised that at this time, EDCC had already completed more than one-half of the aircraft called for on the second contract. [redacted] questioned the reuse of drums, NACC, P. I. F., Incorporated, manufacturer of materials in the State of California, and the reuse of chemicals. [redacted] explained to [redacted] that EDCC had attempted to use reconditioned drums and used drums and had determined that it was feasible and practical to reuse good drums which had been new when shipped to McClellan Air Force Base, California, but that EDCC could not utilize reconditioned drums due to a leakage problem. [redacted] advised that approximately 25% of drums were reused. At this time, [redacted] further explained to [redacted] that manufacture of chemical at NACC saved some freight, however, a large portion of the raw materials needed still had to be shipped to California from Texas. He also discussed P. I. F., Incorporated, with [redacted] and explained to him that P. I. F., Incorporated, was formed based on a recommendation by the Internal Revenue Service and [redacted] accountants as a manner in which to reduce taxes, to allow his daughters to participate in his enterprises without controlling EDCC, and to protect some capital in the event of loss since EDCC could not afford adequate product liability protection. [redacted] advised that rent to P. I. F., Incorporated, paid by EDCC was deliberately set and below going rates to insure acceptance by the Internal Revenue Service.

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[redacted] advised that he further told [redacted] that EDCC had attempted to reuse chemicals without great success. He advised that there is a point where it is uneconomical to add good material to bad material and that three aircraft seemed to be the optimum that can be desealed without excessive use of additives. He further advised that the contract EDCC has with the USAF does not call for single use of the product in one aircraft. He advised that SR-51 was recycled, however, there was no appreciable savings to EDCC and advised that the USAF did not lose any money as a result of this recycling. [redacted] advised that he considers recycling to be the rejuvenation of the product which had been utilized in three aircraft in order to bring it up to full strength. He considers reclaiming to be redistillation of SR-51 to recover solvents.

[redacted] advised that the negotiation of dollar amounts in the second contract took into account the reuse of drums, freight expenses from San Antonio, Texas, and from Stockton, California to McClellan Air Force Base, California, and the reclaiming and recycling of the product. He also advised that the USAF was aware of EDCC's attempts to reclaim materials from the used SR-51 at the McClellan Air Force, California, laboratory, EDCC's San Antonio laboratory, and at Romic Chemical Company in California. These attempts resulted in the reclamation of some petroleum solvent by vacuum distillation from material by Romic Chemical, however, Romic Chemical was then cited for pollution by the California Air Control Board and ceased reclamation attempts. b6
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[redacted] advised that RMHC is presently reclaiming solvents for EDCC on the [redacted] ranch in Bandera, Texas, however, advised that the new material is only worth approximately \$.80 per gallon and as such, this reclamation process is more to conserve resources than for profit.

He further advised that approximately eleven drums of waste material are produced per aircraft after evaporation and other losses.

[redacted] furnished a summary of used SR-51 and SR-51-A as of January, 1978, which is set forth as follows:

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SUMMARY OF USED
SR-51 and SR-51A

<u>January 1978</u>	<u>No. of Drums</u>
American Waste Disposal (landfill)	1680
Romic Chemical (reclaimed)	218
R. M. Hughes (reclaimed)	240
Rusted through and sold for steel	410
On hand McClellan AFB	100
On hand Stockton	240
On hand San Antonio	260
On hand R.M. Hughes	<u>80</u>
	3228

<u>Total Drums to McClellan AFB</u>	<u>Waste generated at present rate</u>
2nd Contract 119 Aircraft x 17.2	2047 1209
3rd Contract 53 Aircraft x 17.2	911 583
4th Contract 103.5 Aircraft x 17.2	<u>1780</u> <u>1138</u>
	4738 3025

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[redacted] made available a copy of a review completed by [redacted] of the audit performed on EDCC by the Defense Contract Audit Agency (DCAA). This review stated that DCAA placed too much emphasis on some aspects of EDCC's internal records that were never represented to DCAA as being complete and accurate and offered as an example that batch sheets are utilized for quality control purposes only to assure the consistent quantity of chemicals. The following list of solvent purchases were furnished:

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150 Solvent Purchases (A)

Date	Vendor	Invoice #	Amount	Quantity (Gal)
12-08-76	Central Solvents	98730	3,397.94	4007
02-28-77	Texas Solvents	07184	2,720.00	4000
02-10-77	Texas Solvents	07067	2,720.00	4000
04-22-77	Texas Solvents	07542	3,500.00	5000
04-22-77	Texas Solvents	07541	353.50	505
04-12-77	Texas Solvents	07460	3,542.00	5060
03-31-77	Texas Solvents	07400	2,380.00	3500
03-31-77	Texas Solvents	07399	486.20	715
05-13-77	Central Solvents	2639	3,480.00	4000
05-16-77	Texas Solvents	07697	577.50	825
12-08-76	Texas Solvents	06724	4,080.00	6000
10-26-76	Texas Solvents	06413	2,842.40	4180
09-30-76	Texas Solvents	06234	2,771.00	4075
08-05-76	Texas Solvents	05828	2,720.00	4000
06-09-76	Texas Solvents	05404	536.80	440
07-07-76	Texas Solvents	05604	<u>2,703.00</u>	<u>3975</u>
			38,810.34	54282
06-28-77	Central Solvents	3709	<u>3,480.00</u>	<u>4000</u>
			42,290.34	58282

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Analysis of Thioacten Purchased (A)
 Eldorado Chemical Company
 Contract F04699 76 90268

Date	Amount
1976	
May 4	17,150.00
May 18	25,300.00
June 14	8,820.00
June 15	15,876.95
July 21	17,248.00
Aug. 5	17,248.00
Aug. 26	17,248.00
Sept. 8	17,248.00
Oct. 1	22,422.00
Oct. 15	25,872.00
Nov. 10	34,496.00
Dec. 15	34,496.00
1977	
Jan. 10	34,496.00
Jan. 10	11,200.00
Jan. 31	34,496.00
Feb. 28	34,496.00
Mar. 28	34,496.00
Apr. 3	34,496.00
May 16	34,496.00
June 7	34,496.00
June 15	34,496.00
June 27	<u>34,496.00</u>
	575,088.95

(A) Assumed to be for this contract by reference to date posted.

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DMAC Purchases (C)

Date	Vendor	Invoice #	Amount	Quantity
12-30-76	DuPont	133-000124	2,562.50	4100
01-18-77	DuPont	V41-29055		
02-18-77	DuPont	L33-009795	14,883.00	24600
03-25-77	GAF	T00216-0	4,140.00	4600
05-16-77	DuPont	133-027566	13,448.00	24600
10-25-76	DuPont	L33-054491	4,797.00	8200
07-23-76	DuPont	L33-036900	<u>4,797.00</u>	<u>8200</u>
			44,627.50	74300
08-09-77	DuPont	L330431250	<u>2,767.50</u>	<u>4100</u>
			47,395.00	78400

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TEP Purchases (D)

Date	Vendor	Invoice #	Amount	Quantity
05-04-77	Eastman	7540-3614	1,143.45	1485
07-28-76	Eastman	6840-2465	<u>1,143.45</u>	<u>1485</u>
			2,286.90	2970

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[redacted] advised in his review that the number of drums purchased by EDCC according to the DCAA from July 1, 1976, to June 30, 1977, was 3,178. [redacted] advised that he personally examined invoices for the purchase during this period of 3,443 55-gallon drums. [redacted] stated that DCAA's comment that EDCC's production for this period would require a total of 7,080 drums left the impression that drum purchases by EDCC during this period could not have contained everything that EDCC produced during this period. He further stated in his review that the 3,443 drums purchased during this period by EDCC did not take into consideration either bulk delivery or alternate types of drums of various sizes. A review of drum purchases is set forth as follows:

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Drum Purchases

Date	Vendor	Invoice #	Amount	Quantity
02-16-77	Sharney	13482	3,524.40	264
01-31-77	Sharney	13412	3,649.40	264
05-09-77	Sharney	13977	3,524.40	264
04-21-77	S.A. Drum	G106	1,200.00	150
04-11-77	Sharney	13809	3,524.40	264
03-08-77	Sharney	13630	3,524.40	264
03-22-77	Sharney	13714	3,524.40	264
04-14-77	Greif Bros.	11387	4,460.55	227
12-08-76	Sharney	13098	3,567.40	264
05-14-77	S.A. Drum	G122	800.00	100
12-30-76	Sharney	13236	3,392.40	264
09-29-76	S.A. Drum		400.00	50
10-04-76	S.A. Drum		<u>800.00</u>	<u>100</u>
			35,891.75	2739
06-02-76	Grief Bros.	43760	717.60	60
09-07-76	Grief Bros.	44714	474.40	32
06-22-77	Sharney	14283	1,050.00	84
06-13-77	Sharney	14211	3,524.40	264
06-21-77	Sharney	14261	3,524.40	264
			45,182.55	3443

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[redacted] review further set forth a summary of computed costs versus company purchases for component chemicals as follows:

<u>Chemical</u>	Computed Cost	Invoice Purchases	Variance
A	<u>57,163.02</u>	<u>42,290.34</u>	<u>14,872.68</u>
B	597,690.51	575,088.95	22,601.56
C	40,423.26	47,395.00	(6,971.74)
D	10,858.95	2,286.90	(Note)
E	31,327.73	Inventory	(Note)

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Chemicals D and E were in stock prior to effective date of contract and were priced at current market price.

[redacted] review advised that the relationship between P. I. F., Incorporated, and EDCC had been discussed during the initial audit of the contract proposal for contract number F04699-76-90268. He further advised that there had never been an attempt to not fully disclose this relationship and it was always handled "at arms length." His review advised that cost increases and rental payments to P.I.F., Incorporated, resulted from the completion of a new office, laboratory, and warehouse by EDCC.

[redacted] advised that when the product furnished by EDCC was utilized in a USAF aircraft, it was considered United States Government property. When it was removed from USAF aircraft, it was considered United States Government property, however, EDCC was directed by the USAF to dispose of the product.

[redacted] further advised that EDCC did not utilize RMHC as a straw company in order to charge the USAF more for a product that EDCC could have produced more cheaply. EDCC received all quantities of chemicals produced by RMHC [redacted] were ordered by EDCC and all invoices between RMHC and [redacted] reflect actual amounts of chemicals ordered and received. [redacted] stated that neither RMHC or EDCC received kickbacks.

[redacted] advised that the distillation unit was utilized by EDCC at Hondo, Texas, for a period of two to three months and which produced a product subsequently named the "Hondo Product". This product was utilized in support of EDCC's contract with USAF. The operation of this distillation unit was taken over by RMHC. When this distillation unit was later moved to a ranch in Bandera, Texas, the operation unit was taken over by RMHC and the product produced was manufactured solely by RMHC, not EDCC. The product produced by RMHC was sold to and purchased by EDCC.

[redacted] denied participation in, or any knowledge of, the submission of fraudulent information from RMHC to EDCC or participation in the submission of competitive pricing data to the USAF in relation to contracts EDCC has with the USAF.

Date

2/26/79

ROUTING AND TRANSMITTAL SLIP

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1.

White Collar Crimes Section

2. J. Egar Hoover Building

Federal Bureau of Investigation

3. 9th & PA Avenue, N.W.

Washington, D.C. 20535

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Please send me a copy of FBI reports on R.M. Hughes Company, San Antonio, Texas, and on Eldorado Chemical Company, San Antonio, Texas.

While DCAA was conducting an audit on Eldorado Chemical Company last year, certain discrepancies were detected in Eldorado transactions involving the R.M. Hughes Company. On 31 July 1978, FBI Agent [redacted] visited DCAA's San Antonio suboffice and obtained information and documents on transactions between Eldorado Chemical and R.M. Hughes Company.

120 Thank you for your assistance.

1 copy sent 6/8/79 ADW

116-7336 206-76-TX

30 JUN 13 1979

DO NOT use this form as a REC clearance

FROM: (Name, office symbol, Agency)

Defense Contract

Agency

Phone No.

Cameron Station, Alexandria, VA 22314 274-7322

5041-102

U.S. G.P.O. 1977-241-530/3090

OPTIONAL FORM 41 (Rev. 7-76)

Prescribed by GSA

FPMR (41 CFR) 101-11.206

46-7336 1-5 JPK

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5/2/79

To: SAC, San Antonio 46-3022

From: Director, FBI 46-73361

UNSUB;
dba R. M. HUGHES COMPANY
FAG - USAF
(FRAUDULENT INVOICES) (A)
OO: SA

ReSAairtel 7/21/17

San Antonio is requested to submit within 30 days an LHM setting forth the latest developments in this case since referenced airtel.

San Antonio is also requested to change captioned classification from 46 to 206. FBIHQ will change its classification accordingly.

$$J_{WP} : k d^W \cdot \{ \} \quad (4)$$

EX-108 206-76-1X2
REC-69 ~~46-733613~~

REU-097
Classifying —

A rectangular stamp with a double-line border. The top line contains the text "MAILED 2". The bottom line contains the date "MAY 3 1979". At the bottom center, the letters "FBI" are printed vertically.

8 MAY 8 1979

UNITED STATES GOVERNMENT

memorandum

DATE:

5/31/79

REPLY TO

ATTN OF:

Ole

SUBJECT:

SAC, SAN ANTONIO (206-2) (P)

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70X

[REDACTED]
[REDACTED] El Dorado Chemical Company, Inc.,
6700 Lookout Road, San Antonio, Texas;

[REDACTED]
[REDACTED] R. M. Hughes, Inc.,
614 South Medina, San Antonio, Texas
FAG - DEPARTMENT OF DEFENSE
(USAF - CONTRACT FRAUD) (A)

OO:SAN ANTONIO

TO: DIRECTOR, FBI (46-73361)

Re San Antonio report of SA [REDACTED]
3/13/79, Sacramento FD-4 4/3/79, and Bureau airtel to
San Antonio 5/2/79.

In addition to investigation in this matter reported by the San Antonio Division in prosecutive report of SA [REDACTED] dated 3/13/79, this matter was discussed with Assistant U.S. Attorney Wayne F. Speck, Chief Criminal Branch, Western District of Texas, San Antonio, Texas, on 4/24/79, and on 5/9/79. AUSA Speck advised that he is favorably disposed toward prosecution in this matter and it is his intention to have a conference with captioned subjects and their attorneys in the latter part of May, 1979, or early part of June, 1979, before rendering a prosecutive opinion.

The Bureau and Sacramento will be advised of the prosecutive opinion of AUSA Speck.

No LHM being submitted.

REC-69

206-76-1X3

EX-124

20 JUN 4 1979

- (2) - Bureau
2 - Sacramento (206-12) (Info.)
2 - San Antonio
JWK:cgw
(6)

61 JUN 13 1979

Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan



UNITED STATES GOVERNMENT

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

Memorandum

TO : DIRECTOR, FBI (46-73361)

DATE: January 10, 1980

FROM : SAC, SAN ANTONIO (206-2) (P)

SUBJECT: [REDACTED]

b6
b7C

et al
FAG - DEPARTMENT OF DEFENSE (USAF - CONTRACT FRAUD) (A)
OO: SA

Re SA letter to Bu, 5/31/79

Enclosed for Sacramento are two copies of a letter dated 10/12/79, from AUSA Wayne F. Speck to SAC San Antonio, re captioned matter.

For information Bureau and Sacramento, by letter dated 10/12/79, AUSA Wayne F. Speck, Chief, Criminal Section, Western District of Texas, San Antonio, Texas, advised that for the time-being, he was declining prosecution of this matter, although he was not absolutely convinced there was not a prosecutable case. Accordingly, this matter is being investigated by a combined FBI/IRS/GAO Task Force, through a Federal Grand Jury in the Western District of Texas, San Antonio, Texas.

The Bureau and Sacramento will be advised of the results of this Task Force investigation re prosecution of this matter.

② - Bureau
2 - Sacramento (206-12) (Enc. 2)
2 - San Antonio
JWK:ch
(6)

JAN 28 1980 FBI



59 FEB 5 1980

Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

OPTIONAL FORM NO. 10
(REV. 7-76)
GSA FPMR (41 CFR) 101-11.6
5010-112

FBI

TRANSMIT VIA:

- Teletype
 Facsimile
 AIRTEL

PRECEDENCE:

- Immediate
 Priority
 Routine

CLASSIFICATION:

- TOP SECRET
 SECRET
 CONFIDENTIAL
 UNCLAS E F T O
 UNCLAS

Date 1/29/80

TO:

DIRECTOR, FBI (206-76)

FROM:

SAC, SACRAMENTO (206-12) (P)

SUBJECT:

b6
b7C

LM

[REDACTED]
 [REDACTED] El Dorado Chemical Company, Inc.,
 6700 Lookout Road,
 San Antonio Texas

[REDACTED]
 [REDACTED] R.M. Hughes, Inc.,
 614 South Medina,
 San Antonio, Texas
 FAG - DOD (USAF - CONTRACT FRAUD) (A)
 OO: Sacramento

Re San Antonio letter to the Director dated
 5/31/79, and San Antonio telephone call to Sacramento on
 1/9/80.

On 11/21/79, AUSA Malcolm Stuart Segal, Eastern District of California, advised that AUSA Wayne F. Speck, Chief Criminal Branch, Western District of Texas, San Antonio, Texas, had agreed to defer prosecution in the captioned matter to the Eastern District of California. In that prosecution is to be conducted in the Eastern District of California, it is proposed that Sacramento be designated Office of Origin.

In order to expedite the prosecution in this matter it is requested that San Antonio furnish Sacramento with FD 302s regarding interviews conducted in this matter.

② Bureau
 3-San Antonio (206-2)
 2-Sacramento
 RPP:js
 (7) R328

206-76-2

6 FEB 2 1980

Approved: REW/mom
661-652-1500Transmitted _____
 (Number) (Time)

Per _____

SJ

SC 206-12

evidence, and any documentation furnished the San Antonio Office by Defense Contract Audit Agency (DCAA) auditor, [redacted]

LEADS:

SAN ANTONIO

AT AUSTIN, TEXAS. Will conduct corporation checks and obtain certified copies, where possible, of statements of officers and articles of incorporation for the captioned firms and the property management company established by [redacted] known as PIF Inc.

AT SAN ANTONIO, TEXAS. Will forward above mentioned FD 302s, evidence and documents to the Sacramento Office.

RECEIVED
TELETYPE DEPT

EP 80 15 192

b6
b7c

SC0003 2601510Z

RR HQ SA

DE SC

R 161510Z SEP 80

FM SACRAMENTO (206-12) (P) SP
TO DIRECTOR (206-76) ROUTINE
SAN ANTONIO (206-2) ROUTINE

BT

UNCLAS

Exec AD Adm. _____
Exec. Adm. Inv. _____
Exec. AD LBS _____
Asst Dir. _____
Audi. Servs. _____
CRM Inv. _____
Legal _____
Mktg. _____
Lab Services _____
Legal Coun. _____
Plan & Instl. _____
Rec. Mgr. _____
Tech. Servs. _____
Training _____
Off. of Cong.
& Public Atts. _____
Telephone Inv. _____
Director's Sec'y _____

ELDORADO CHEMICAL COMPANY, INC.:

R.M. HUGHES, INC.; FAG - DOD (A), OO: SACRAMENTO.

RE SACRAMENTO TELCALL TO SAN ANTONIO SUPERVISOR

, SEPT 15, 1980.

IN AN EFFORT TO RESOLVE QUESTIONS REGARDING RELATIONSHIP(S)

AND DEALINGS BETWEEN ELDORADO CHEMICAL COMPANY AND R.M. HUGHES

COMPANY. ARRANGEMENTS HAVE BEEN MADE BY AUSAA MALCOLM STUART

SEGAL, CHIEF CRIMINAL DIVISION, EASTERN DISTRICT OF CALIFORNIA APR 22 1980

SACRAMENTO, CALIFORNIA, WITH THE ATTORNEY FOR ELDORADO CHEMICAL

COMPANY, FOR AGENTS OF THE FBI TO REVIEW

PERTINENT FINANCIAL RECORDS OF ELDORADO CHEMICAL COMPANY.

SC-EIS- 448-9110

PAGE TWO SC 206-12 UNCLAS

IN VIEW OF THE VOLUMINOUS NATURE OF THESE RECORDS, IT HAS BEEN DETERMINED THAT IT IS NOT PRACTICAL FOR ELDORADO CHEMICAL TO TRANSPORT THE RECORDS TO THE FEDERAL GRAND JURY IN SACRAMENTO PURSUANT TO A SUBPOENA DUCES TECUM. AUSA SEGAL HAS REQUESTED SACRAMENTO CASE AGENT TRAVEL TO SAN ANTONIO TO EFFECT THIS REVIEW IN AN EFFORT TO CLARIFY FACTS FOR DEVELOPMENT OF INDICTMENT COUNTS AGAINST CAPTIONED SUBJECTS.

CONTACT WAS MADE WITH SAN ANTONIO DIVISION ON SEPT 15, 1980, AT WHICH TIME SAN ANTONIO CONCURRED WITH THIS TRAVEL PLAN.

UACB SAC(A)

AND ACCOUNTANT

b6
b7c

[REDACTED] WILL TRAVEL TO SAN ANTONIO ON SEPT 22, 1980, FOR ABOVE MENTIONED PURPOSE.

BT

34 2631631Z

PB HQ

DE SC

P 191631Z SEP VTP

M SACRAMENTO (206-12) (P)

TO DIRECTOR (206-76) PRIORITY

BT

UNCLAS

9 SEP 86 1637Z

THE ESTATE OF THE
LAW SECTION

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b7c

AKA: ET AL: FAG-DOD (A): 00:

SACRAMENTO.

RE SACRAMENTO TELETYPE TO DIRECTOR, SEPT 15, 1980, AND
FBIHQ TELEPHONE CALLS TO SACRAMENTO, SEPT 18, 1980 AND SEPT 19,
1980.

ON SEPT 22, 1939, SA (A) AND ACCOUNTANT

ANTICIPATE TRAVEL TO THE SAN ANTONIO DIVISION TO
REVIEW SUBPOENAED GRAND JURY MATERIALS.

THE LENGTH OF STAY FOR THIS PURPOSEE WILL BE FIVE DAYS WITH
RETURN TO SACRAMENTO ON FRIDAY, SEPT 26, 1980.

SAC'S IN SACRAMENTO AND SAN ANTONIO HAVE BEEN ADVISED OF THE
TRAVEL PLANS OF S[REDACTED] AND ACCOUNTANT [REDACTED]

AND SUPPORT THESE PLANS.

UACB, TRAVEL WILL BE CONDUCTED AS PLANNED.

BT

BT
9/17/80
SC was advised to refer
to STC airtel dated 6-15-79
captioned 'Investigative Travel'
and not to request travel
UACB in the future.
Travel was granted.
(D) Movement Section

FBI

TRANSMIT VIA:

- Teletype
 Facsimile
 AIRTEL

PRECEDENCE:

- Immediate
 Priority
 Routine

CLASSIFICATION:

- TOP SECRET
 SECRET
 CONFIDENTIAL
 UNCLAS E F T O
 UNCLAS

Date 3/6/81

TO: DIRECTOR, FBI (206A-76)
 FROM: SAC, SACRAMENTO (206A-12) (P)
 SUBJECT: CHANGED

10311023-3-VY

Eldorado Chemical Company, Inc.
 6700 Lookout Road
 San Antonio, Texas.

b6
b7C

R. M. Hughes and Company, Inc.
 614 South Medina,
 San Antonio, Texas

FAG - DOD (USAF - CONTRACT FRAUD) (A)
 OO: Sacramento

"ENCLOSURE IN BULKY ROOM"

Enclosed under separate cover for the Bureau, Laboratory Division, are three one pint containers of chemicals known as SR-51, SR-51A, and GD-500. DE-36 206-16-5

Enclosed with this communication are items taken from the files of the Texas Air Resources Board (TARB) regarding the operation of the R. M. Hughes and Company, Inc. (Hughes) Distillation Unit used to manufacture thioacten (a trade name for a special thiophenol). Background material regarding the nature of the chemicals enclosed under separate cover, derived from Air Force contract files has been provided. In addition, a photograph of the Hughes Distillation Unit located in Bandera, Texas, is included.

2 MAR 21 1981

The title is marked changed to include aliases of the subjects and to correct the spelling of the subject firms involved.

3-Bureau (Encl. 3) (206A-76) (1-Package)

2-Sacramento

RPP:js

Approved _____

Transmitted _____

(Number) (Time)

EMERGENCY ONLY

Per _____ RPP

JUN 23 1981 mch/F20

Z-1000
NOT OVER

For the information of the Chemistry Lab, Eldorado Chemical Company (Eldorado) has been involved in the desealing of fuel cavities in the F-111 Fighter/Bomber (F-111) taking place at McClellan Air Force Base, California. Through a competition held at General Dynamics Corporation in 1973, Eldorado was named as the sole source to accomplish the task of desealing the F-111. Soon after the Air Force began using the F-111, it was noted that the F-111 was suffering from leaking fuel cavities as a result of holes appearing in the plastic type sealant used in the wing areas. At that time the Air Force decided to replace this sealant and authorized General Dynamics to hold a competition and chose the best product service for the job.

After Eldorado was chosen by General Dynamics, the Air Force began contract negotiations to award a sole source type contract to Eldorado for desealing the F-111 fleet. Certain discrepancies have been noted in the way Eldorado has handled the contract negotiations and a supply of the contract services to the Air Force during the time frame involved in this contract (1976 through the present). In summary, allegations in this matter include:

1. Eldorado has dealt through a property management company (PIF Incorporated) owned by relatives of the principals of Eldorado. This effort has increased the cost of ownership of property used by Eldorado during the course of business and subsequently inflated the contract price negotiated by the Air Force and Eldorado during five separate contracts.

2. Eldorado has not furnished the government with the amount of desealing chemicals called for in contracts entered into between Eldorado Chemical Company and the Air Force for the desealing of the F-111. Eldorado subsequently invoiced the government for payment at the full contract amount.

3. Eldorado has recycled the desealing chemicals which reduced contract costs to the contractor. The contract entered into by Eldorado and the Air Force calls for new materials only. At any rate, the reduction in costs to the contractor was not passed on to the Air Force in subsequent contracts.

4. The drums used by Eldorado to transport the desealing liquid from its point of manufacture to McClellan Air Force Base, California, were reused by the contractor when the contract required that new drums be used with each shipment.

5. Transactions between Eldorado and its major supplier of chemicals, Hughes, appear to be not at arms length. Eldorado has used Hughes as its only source of the most expensive chemical component in the desealing chemicals that Eldorado has sold the United States Air Force. This chemical component thioacten (a trade name for a special thiophenol) comprises approximately 25 percent of the total contract cost to the contractor.

Eldorado's desealing process for the F-111 was accomplished by a method which required the use of three chemicals (SR-51, SR-51A which is a SR-51 rejuvenator, and GD or ED-500 which is an alkaline cleaner) which were applied by a sprayer type system to the sealed fuel cavities.

The sole source contract status entered into by Eldorado with United States Air Force required that full disclosure of costs of the contractor be made to the government. A sole source contract is awarded on a cost, plus profit basis due to the lack of competitive bidding in the sole source situation.

When cost figures were provided by Eldorado it was learned that a major component of the desealing chemicals (SR-51 and 51A) was a very expensive chemical, thioacten. Interviews with the principals of Eldorado revealed the information that when Eldorado began testing its chemicals in the desealing of the F-111, Eldorado was able to acquire a mercaptan mixture (closely resembling the thioacten) from a company that was soon to go out of business. Eldorado subsequently purchased a thiophenol from another chemical company which imported the chemical from Japan at the cost of \$3.86 per pound. The principals of Eldorado decided that this supply could not always be insured, therefore, Eldorado through research in their laboratory, was able to nearly duplicate the thiophenol. Eldorado named this product thioacten. In December of 1975, Eldorado leased property in Bandera, Texas, the [redacted] Ranch, at an annual cost of \$1,500. On that property, Eldorado set up a \$450 used still to begin distilling thioacten. Some product was then produced by Eldorado until Eldorado entered into an agreement

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with [redacted] of Hughes to manufacture thioacten at the [redacted] Ranch site. [redacted] then redesigned the distillation unit at the [redacted] Ranch and with the help of Eldorado began manufacturing the thioacten. Since that time, the lease on the [redacted] Ranch and the fixtures and equipment originally placed by Eldorado at the site, have been given to Hughes.

In interviews with [redacted] and [redacted] of Eldorado [redacted] and [redacted] advised that in addition to producing thioacten, Hughes also distills and reclaims the spent solvent (SR-51 and 51A) from the operation at McClellan Air Force Base at the Bandera site. In an interview with [redacted] prior to the time of the interview with the principals of Eldorado, [redacted] steadfastly denied that Hughes reclaims a spent solvent for Eldorado Chemical.

The Sacramento Division is currently attempting to reconstruct costs of the various chemicals used by Eldorado (SR-51, SR-51A, and GD-500) to ascertain to what extent, if any, the Air Force has been overcharged for work completed during this contract. Two formulas for thioacten have been obtained during this investigation. It is believed that since thioacten constitutes a major percentage of the total contract price, thioacten will be the key to the overcharge. The first formula, as listed below, was obtained from [redacted] of Eldorado and the chemist who originated thioacten, he furnished the thioacten formula as follows:

1 percent paraffin wax (to suppress foam, mineral oil may be substituted), 6 percent fatty acid (acintol FD-1), 93 percent disulfide oil. Distill this mixture at 450 to 550 degrees F. thereafter add one percent lime (to take out the free hydrogen sulfide), allow to settle, add 10 percent thiophenol. The yield is 25 to 50 percent product, remaining is waste material.

In an independent interview [redacted] gave the following formula (this formula was constructed from [redacted] attempt to cloak his costs for the manufacturer of thioacten):

SC 206A-12

<u>Item</u>	<u>Amount</u>
1	748 pounds
2	120 pounds
3	200 pounds
4	80 pounds
5	25 gallons
6	8 pounds
7	70 gallons
8	35 pounds

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b7C

b3 Rule 6(e) FRC

At the time of the interview, [redacted] advised that item number 7 was butane which was required to "cook" the mixture, and that items 4 through 7 are required in the manufacturing process. By using [redacted] obtained by Federal Grand Jury subpoena, comments from [redacted] interviews, and [redacted] process for manufacturing thioacten, the Sacramento case Agent has surmised that the following is [redacted] partially decoded formula:

<u>Item</u>	<u>Quantity</u>	<u>Chemical Name</u>
1	748 pounds	Disulfide Oil
2	120 pounds	Acinitol FD-1
3	200 pounds	Thiophenol
4	80 pounds	(Unknown but probably lime)
5	25 gallons	Mineral Oil
6	8 pounds	(Unknown but could be sodium hydroxide)
7	70 gallons	Butane
8	36 pounds	Thiophenol

SC 206A-12

It is noted that this formula substantially differs from [redacted] original formula in that [redacted] adds 200 pounds of thiophenol at the start of the process. [redacted] describes his yield as being 330 pounds which translates to 37.38 gallons of thioacten (shipping records show that 55 gallons of thioacten equal 490 pounds). In a confidential report to the TARB, [redacted] described one batch of consisting of 110 gallons or approximately 800 pounds. [redacted] still has been described by other sources to have the capacity of approximately 110 gallons. The Sacramento case Agent feels that [redacted] still in not of sufficient capacity to accommodate [redacted] formula, and that most likely, [redacted] uses his formula without adding the initial 200 pounds of thiophenol. The reduction of thiophenol in [redacted] formula (by deleting the initial 200 pounds) results in an overall decrease in cost to the government of thioacten from \$3.83 per pound to \$2.44 per pound (or 36 percent). In that thioacten accounts for approximately 25 percent of the total contract price and that the total cost of the contract during the past 5 years for the desealing of the F-111 is approaching \$8 million, the loss to the government from this action alone can be estimated at approximately \$800,000.

On February 26, 1981, the Sacramento case Agent took samples of the three chemicals used in the desealing of the F-111.

The following is information which is already known about the three chemicals. There are conflicting formulas regarding SA-51 and 51A due to embellishments in the non-cooperative nature of the subjects.

GD-500

GD-500 is an alkaline cleaner originally developed by General Dynamics and currently produced by Eldorado. GD-500 is used to rinse F-111 fuel cavities after the desealing process is completed. GD-500 is used in a three to one solution (25 percent GD-500 plus 75 percent water) in this process.

SR-51

SR-51 is the primary chemical used in the desealing process. Composition of this chemical, as related to the physical science lab, McClellan Air Force Base, for safety reason is:

SC 206-12

Thiophenol (thioacten), 10 to 20 percent

Pyrrolidone, 5 to 10 percent

Triethyl phosphate, one to 5 percent

Petroleum solvent (high flash aromatic), 60 to 90 percent

The flash point of SR-51 is given as being higher than 165 degrees F. In an interview, [redacted] of Eldorado advised that the components of SR-51 are thioacten, petroleum solvent, dimethylacetamide, triethyl phosphate and fluoro carbon detergent (an example of which is FC-95 as manufactured by 3-M Corporation).

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SR-51A

SR-51A is similar in composition to SR-51. The following percentages of the same chemicals as exist in SR-51 have been given to the physical science laboratory at McClellan Air Force Base by the principals of Eldorado in compliance with environmental and safety requirements:

Thiophenol (thioacten), 70 to 90 percent

Pyrrolidone, 2 to 8 percent

Triethyl phosphate, 1 to 5 percent

Naptha aromatic, 5 to 10 percent

In an interview [redacted] advised that SR-51A would only have 15 to 18 percent thiophenol (thioacten). This would change the SR-51A formula as given to the physical science laboratory, McClellan Air Force Base to:

Thiophenol (thioacten), 15 to 18 percent

Pyrrolidone, 2 to 8 percent

Triethyl phosphate, 1 to 5 percent

Naptha aromatic, 60 to 80 percent

It is believed that the formula shown immediately above more closely represents SR-51A.

The following are the approximate weights and volumes of chemicals thought to components of thioacten, derived from chemical invoices retained through Federal Grand Jury subpoenas:

[Redacted]

LEADS:

The Chemistry Lab is requested to perform the following tests:

1. Analyze samples of chemicals submitted for chemical composition and in the case of SR-51 and SR-51A determine the mercaptan content.

2. Determine which formula [] would result in the production of thioacten as is present in SR-51 and SR-51A. Determine what the effect the additional 200 pounds of thiophenol in [] formula would have on the end thioacten product.

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3. Determine if spent SR-51 (SR-51 already used in the desealing operation) could be reclaimed (for solvents or mercaptans) by using the same distilling equipment used to produce thioacten by []

4. Determine the size of a distillation unit needed to produce thioacten according to [] formula.

The Sacramento case Agent is SAA [] and can be reached at FTS number 468-9110, for any questions regarding these requests.

FBI

TRANSMIT VIA:

- Teletype
 Facsimile
 AIRTEL

PRECEDENCE:

- Immediate
 Priority
 Routine

CLASSIFICATION:

- TOP SECRET
 SECRET
 CONFIDENTIAL
 UNCLAS E F T O
 UNCLAS

Date 4/7/81

Exec. AD-Adm.
Ex. AD-Inv.
Ex. AD-LES
Asst Dir.:
Adm. Servs.
Crim. Inv.
Ident.
Intell.
Laboratory
Legal Coun.
Plan & Insp.
Rec. Mgmt.
Tech. Servs.
Training
Off. of Cong. & Public Affs.
Telephone Rm.
Director's Sec'y

TO: DIRECTOR, FBI (206A-76) (Attn: FBI Laboratory)

FROM: SAC, SACRAMENTO (206A12) (P)

SUBJECT: [REDACTED]

[REDACTED]
 Eldorado Chemical Company, Inc.
 San Antonio, Texas
 FAG - DOD (USAF) (A)
 OO: SC

Re telcall of SA [REDACTED] Laboratory Division,
 to SA [REDACTED] Sacramento, 3/27/81.

104090215-

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Enclosed under separate cover for the Bureau, Laboratory Division, is a 10 milliliter sample of SR-51A taken from the Eldorado Chemical Company desealing site at McClellan Air Force Base on 4/6/81.

Referenced telephone call with SA [REDACTED] revealed that the sample of SR-51A submitted by the Sacramento Division on 3/6/81 contained no thiophenol. Subsequently, the Sacramento Division obtained another sample of SR-51A to be retested.

A review of the case file at Sacramento indicates that "Thioacten" is simply a trade name given a thio distillate or mercaptan mixture produced by R.M. Hughes Company. Sacramento believes that the large variances allowed and the primitive methods employed by the R.M. Hughes Company and Eldorado Chemical in the manufacture of thioacten and the

206-76-6

RETIAINED IN LAB FOR
LAB ACTION AND REPORT

3 - Bureau
 (2 - 206A-76)
 (1 - Package Copy)
 2 - Sacramento
 RPP:mml
 (5)

17 APR 23 1981

Approved: [Signature]

Transmitted _____
 (Number) (Time)

Per [Signature]

RMW
SUSPECT

50 APR 30 1981

SC 206A-12

SR chemicals makes it virtually impossible to ascertain if thioacten and thiophenol are identical. In the same respect, the Sacramento Division has not been able to determine if a di-phenyl di-sulfide is used by Eldorado or R.M. Hughes in the manufacturing of the SR chemicals.

LEADS:

The Chemistry Lab is requested to analyze the submitted sample of SR-51A and determine the mercaptan content.

Sacramento is still interested in determining the size of a distillation unit needed to produce thioacten according to [redacted] formula (see referenced airtel).

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FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

DATE: April 27, 1981

TO: SAC, Sacramento (206A-12)

Re:

[redacted]
 [redacted] Eldorado Chemical Company, Inc.
 6700 Lookout Road
 San Antonio, Texas.

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b7C

[redacted] R. M. Hughes and
 Company, Inc. 614 South Medina,
 San Antonio, Texas

TAG - DOD (USAF - CONTRACT FRAUD) (A)
 Invoice of Contents
 OO: Sacramento

Return to [redacted]

Room 3287 TL 155

FBI File # 296-76

Case # 10311023 S VV

10409027 S VV

Mail Room: 1B327, TL 152
 (registered mail)

PSM - Supply Unit, 1B353
 (not registered)

561323814

ONI

WT7

S
5/1/81

Shipping # _____

Shipping Method _____

30 MAY 04 1981

RMM:plb

(5)

AIRTEL

From: Director, FBI (2061-76)
 To: Photographic Operations Unit, Rm. 1B903

b6
b7C

Date:

SAC, SACRAMENTO (2061-12) (P)

Subject: [REDACTED]

okay to AI
 FBI - DOD (DOAF Contract Fraud) (3)
 OO: SC

1. ENCLOSED PHOTOGRAPHIC WORK RELATES TO:

Current Investigation Mug Shot Program Other

2. ENCLOSURE(S)

Film To Be Processed

Size	Color	B&W	Quantity
4 X 5			
135	1	1	
126			
120			
Slides			

Movie Film or Microfilm

Size	Color	B&W	Quantity
16mm			
35mm			
8(super)			
70 mm AHU			

Negatives To Be Printed

Size	Color	B&W	Quantity
8 X 10			
4 X 5			
135			
120			
126			
220			
110			

Other

Item	Quantity

3. WORK REQUESTED

Processing

- Process only
- Process & make print
- Process & make contact print
- Slides to be processed
- Slides to be duplicated
- _____
- _____

Prints To Be Made

- (From 135, 126, and 110)
- 3½ X 5 5 X 7
_____ # prints from each frame
 - Color B&W
 - (From 120 and 4 X 5)
 - 4 X 5 8 X 10
_____ # prints from each frame
 - Color B&W

Prints To Be Made

- Cibachrome
(Prints from slides)
- 3½ X 5
 - 5 X 7
 - 8 X 10

Custom Prints

(From any size negative or slide)

- Quantity _____
 Size _____
 Color B&W

4. PROCESSING CENTER

REMARKS

717966

206-76-

NOT RECORDED

2 OCT 17 1980

SPECIAL INSTRUCTIONS

- Mail Room: Show shipment date and registry number.

- Shipping Room: Show shipment date; bill of lading number; initial invoice; invoice to be placed in administrative file.

ENC. 56

MAIL ROOM

b6
b7C**AIRTEL**

To: Director, FBI (206A-76)
 (Att: Photographic Operations Unit, Rm. 1B903)

From: SAC, SACRAMENTO (206A-12) (P)

Subject: [REDACTED]

aka; ET AL;
 FAG - DOD (USAF Contract Fraud) (A)
 OO: SC

1. ENCLOSED PHOTOGRAPHIC WORK RELATES TO:

Current Investigation Mug Shot Program Other

2. ENCLOSURE(S)

Film To Be Processed

Size	Color	B&W	Quantity
4 X 5			
135	1		1
126			
120			
Slides			

Movie Film or Microfilm

Size	Color	B&W	Quantity
16mm			
35mm			
8(super)			
70 mm AHU			

Negatives To Be Printed

Size	Color	B&W	Quantity
8 X 10			
4 X 5			
135			
120			
126			
220			
110			

Other

Item	Quantity

3. WORK REQUESTED

Processing

- Process only
 Process & make print
 Process & make contact print
 Slides to be processed
 Slides to be duplicated

Prints To Be Made

- (From 135, 126, and 110)
 3½ X 5 5 X 7
 _____ # prints from each frame
 Color B&W
 (From 120 and 4 X 5)
 4 X 5 8 X 10
 _____ # prints from each frame
 Color B&W

Prints To Be Made

- Cibachrome
 (Prints from slides)
 3½ X 5
 5 X 7
 8 X 10

Custom Prints

(From any size negative or slide)

Quantity _____

Size _____

 Color B&W

1cc retained in Pn 1B903
 letter sent to SC
 ACK: Special Projects Section
 Film Processed + Prints made
 KKG 10/15/80

4. REMARKS

(include trial date or other mandatory deadline and any other specific instructions)

Materials are needed for grand jury presentation on 11/19/80.
 Custom prints may be desired for this presentation. Request
 will be submitted after receipt of these prints.

206-76-

NOT RECORDED

22 OCT 10 1980

17

0185 Film Recd + Retd
 KKG
 SC 10/15/80

2/7/80

g
017 to SC, SA RE 13b S/6/VBD
To: SACs, SACRAMENTO (206-12)
SAN ANTONIO (206-2)

1 [redacted]

From: DIRECTOR, FBI (46-73361)

b6
b7c

[redacted]
AKA; ET AL
FAG- DOD (USAF-CONTRACT FRAUD) (A)
OO: SACRAMENTO

Re Sacramento airtel to Bureau 1/29/80.

The Bureau concurs with Sacramento request.
Accordingly office of origin is changed from San Antonio
to Sacramento.

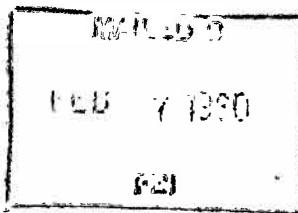
GWL; RPT
(6)

JES

206-76-2X

46-73361-1

Assoc. Dir. _____
Dep. AD Adm. _____
Dep. AD Inv. _____
Asst. Dir.:
 Adm. Servs. _____
 Crim. Inv. _____
Ident. _____
Intell. _____
Laboratory _____
Legal Coun. _____
Plan. & Insp. _____
Rec. Mgmt. _____
Tech. Servs. _____
Training _____
Public Affs. Off. _____
Telephone Rm. _____
Director's Sec'y _____



106-73361-1
46-73361-1
MAIL ROOM 2/7/1980



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To:
SAC, Sacramento (205A-12)

April 28, 1981

From: Director, FBI

FBI FILE NO.

206-76

LAB. NO.

10311023 S VY
10409027 S VY

[redacted]
Eldorado Chemical Company, Inc.
5700 Lookout Road
San Antonio, Texas.

[redacted] R. H. Hughes and
Company, Inc. 614 South Medina,
San Antonio, Texas FAG - DOD (USAF - CONTRACT FRAUD) (A)
Examination requested by:
OO: Sacramento

Reference: Sacramento

Examination requested: Airtels dated March 6, 1981 and April 7, 1981

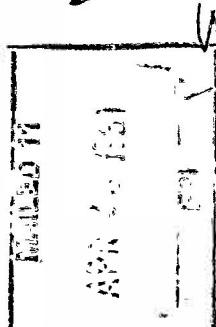
Remarks: Chemical Analyses

The chemical analyses were conducted by Special
Agent [redacted]

SPK
4-24-81

Enclosures (2) (2 Lab report)

RMM:plb*
(4)



ADMINISTRATIVE PAGE

MAIL ROOM

REPORT
of theb6
b7C
bFEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: SAC, Sacramento (206A-12)

April 28, 1981

FBI FILE NO. 206-76-

LAB. NO. 10311023 S VY
10409027 S VY

R [REDACTED] Eldorado Chemical Company, Inc.
6700 Lookout Road
San Antonio, Texas;

[REDACTED] R. M. Hughes and
Company, Inc. 614 South Medina,
San Antonio, Texas
FAG - DOD (USAF - CONTRACT FRAUD) (A)

Specimens received

March 11, 1981, under cover of communication dated
March 6, 1981 (10311023 S VY):

Q1 SR-51

Q2 SR-51A

Q3 GD-500

Specimen received April 9, 1981, under cover of communication dated
April 7, 1981 (10409027 S VY):

Q4 SR-51A

Result of examination:

The Q1 SR-51 liquid contains approximately 3 per cent thiophenol and 12 per cent N, N-dimethylacetamide. The remaining 85 per cent being primarily aromatic hydrocarbons.

The Q2 and Q4 SR-51A liquids contain traces of thiophenol and approximately 7 per cent N, N-dimethylacetamide. The remaining 93 per cent being primarily aromatic hydrocarbons.

In the formation of thiophenol, or other mercaptans, there would be no reason to add thiophenol to the starting materials.

Using [REDACTED] starting ingredients of 748 pounds of disulfide oil and 120 pounds of Acinitol FD-1 the size of the distillation pot would have to be at least 97 gallons. Using [REDACTED] formula an additional 24 gallon capacity would be required to accommodate the 200 pounds of thiophenol. This is assuming that the thiophenol was to be added to the initial batch solution.

No chemical examinations were conducted on specimen
Q3.

Specimens Q1 through Q4 are being returned under
separate cover by United Parcel Service.

RECORDED
3/16/81
plb*

FEDERAL BUREAU OF INVESTIGATION
UNITED STATES DEPARTMENT OF JUSTICE

[redacted]
3/11/81

Laboratory Work Sheet

To: SAC, Sacramento (206A-12)

Re: [redacted] Eldorado Chemical Company, Inc.
6700 Lookout Road
San Antonio, Texas;

[redacted] R. M. Hughes and
Company, Inc. 614 South Medina,
San Antonio, Texas
FAG - DOD (USAF - CONTRACT FRAUD) (A) OO: Sacramento
Examination requested by: Sacramento

Reference: Airtel dated March 6, 1981

Examination requested: Chemical Analyses

Specimens received: March 11, 1981

Q1 SR-51
Q2 SR-51A
Q3 GD-500

FBI FILE NO. 206-76-[redacted]

LAB. NO.

10311023 S VY

YOUR NO.

Examination by:

RECORDED
4/14/81
plb*

FEDERAL BUREAU OF INVESTIGATION
UNITED STATES DEPARTMENT OF JUSTICE
Laboratory Work Sheet

4/9/81

To: SAC, Sacramento (206A12)

FBI FILE NO. 206-76 7

LAB. NO. 10409027 S VY

Re [REDACTED] Eldorado Chemical Company, Inc.
San Antonio, Texas
FAG - DOD (USAF) (A)

YOUR NO.

OO: Sacramento

Examination by:

Examination requested by: Sacramento

Reference: Airtel dated April 7, 1981

Examination requested: Chemical Analyses

Specimens received: April 9, 1981

Q4

SR-51A

3-12-81

10311023-UY

FM SAC SACRAMENTO Feed EXP

9x9x12" box 5n F. Tape c

One cat card and c bone

\$1, 51A + \$1-500

Q1 → GC-MS As is - Methyl Thymidyl + N,N-dimethylbutyric acid
Traces of Triethyl Phosphate
Rt. 85 - No Pyruvate

Q2 → GC-MS As is - Traces of Thymidyl
N,N-dimethylbutyric acid → Base peak
Traces of Triethyl Phosphate

Q1 QUANTITATION OF Thymidyl

Ions = 3% added 2% yielded 0.8%
∴ Nine times less than 3% Thymidyl

Q2 QUANTITATION OF N,N-dimethylbutyric acid

Ions = 7% added 3% yielded 2.7%
∴ nine times less than 7% Thymidyl

Q1 had 12% more than
12% N,N-dimethylbutyric acid

* Q1 & Q2 GC-MS → all peaks. Potassium bally exhibited

10409027

4-13-81

FM SAC SACRAMENTO
(Fed Express) 6x9x12" Box
gt can 10 ml liquid

b6
b7C

Airtel

Uncclas

7/13/82

Director, FBI (206-76)

1 - [redacted]
1 - FOF

SAC, Sacramento (206A-12)

[redacted]
LIA AUT
FAG - DOD (USAF - CONTRACT FRAUD)
OO: Sacramento

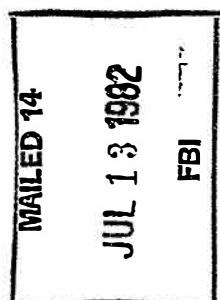
Re FBI Laboratory Report, dated 4/28/81.

The Bureau has been requested by [redacted] General Counsel's Office, Defense Contract Audit Agency (DCAA), FTS 274-7800, to provide DCAA with the current status of this investigation. Referenced communication is the last communication appearing in Bufiles.

Sacramento is instructed to immediately submit an LHM suitable for dissemination to DCAA. The LHM should set forth a summary of the case to date and indicate the current prosecutive status.

██████ sjh
(5)████

Exec AD Adm. _____
Exec AD Inv. _____
Exec AD LES _____
Asst. Dir.:
 Adm. Servs. _____
 Crim. Inv. _____
 Ident. _____
 Insp. _____
 Intell. _____
 Lab. _____
 Legal Coun. _____
 Off. Cong. &
 Public Affs. _____
 Rec. Mgmt. _____
 Tech. Servs. _____
 Training _____
Telephone Rm. _____
Director's Sec'y _____



206-76-8

12 JUL 14 1982

HNT/HMP
MAIL ROOM

FBI

TRANSMIT VIA:

- Teletype
 Facsimile
 AIRTEL

PRECEDENCE:

- Immediate
 Priority
 Routine

CLASSIFICATION:

- TOP SECRET
 SECRET
 CONFIDENTIAL
 UNCLAS E F T O
 UNCLAS

Date 8/20/82b6
b7C

TO: DIRECTOR, FBI (206-76)
 FROM: SAC, SACRAMENTO (206A-12) (P)
 SUBJECT: [REDACTED]

Et Al
 FAG - DOD (USAF-CONTRACT FRAUD)
 OO: SC

Re Bureau airtel dated 7/13/82.

Enclosed for the Bureau are five copies of an LHM regarding the captioned matter, dated 8/20/82.

206-76-9

1-CRIM
 1-CIVIL
 1-OSI
 1-DCAA
 1-10/14/82
 1-D.L.A./G.R.

ATTN: GENERAL COUNSEL'S OFFICE

30 AUG 25 1982

② - Bureau (Enc. 5)
 2 - Sacramento
 RPP/ab
 (4)

Approved: 59 OCT 10 1982

Transmitted _____
 (Number) (Time)

Per _____



U.S. Department of Justice

Federal Bureau of Investigation
Sacramento, California

In Reply, Please Refer to
File No.

August 20, 1982

b6
b7C

[Redacted]
And Others
FRAUD AGAINST THE GOVERNMENT -
DEPARTMENT OF DEFENSE

By way of background in this matter, the following is set forth:

In 1973, Eldorado Chemical Company became interested in the desealing of F-111 fighter/bomber fuel cavities. Eldorado Chemical Company became involved in a competition conducted by General Dynamics Corporation to decide which firm could most effectively deseal the F-111. At the end of this competition, Eldorado Chemical Company was given sole source status, as the only contractor who could deseal the F-111 as per Air Force requirements.

Eldorado Chemical Company's desealing process for the F-111 was accomplished by a method which required the use of three chemicals (SR-51, SR-51A, an SR-51 rejuvenator, and GD or ED-500), which were applied by a sprayer-type system to the sealed fuel cavities. All desealing work on the F-111 was conducted at McClellan AFB, California, and all contracts had been negotiated from that base.

The sole source contract status entered into by Eldorado Chemical Company with the U. S. Air Force required that a full disclosure of cost to the Government be made. A sole source contract is awarded on a cost plus profit basis due to the lack of competitive bidding.

When cost figures were provided by Eldorado Chemical Company, it was learned that a major component of the desealing chemicals was a very expensive chemical, a Thiopenol. Interviews with the principals of Eldorado Chemical Company furnished the information that when Eldorado Chemical Company began testing its chemicals in the desealing of the F-111, Eldorado Chemical was able to acquire a Marcaptan mixture (closely resembling the Thiopenol) from a company that was soon to go out of business. Eldorado Chemical Company subsequently purchased Thiopenol

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

206-176-9
176-9

[redacted]

from another chemical company which imported the chemical from Japan at the cost of \$3.86 per pound. The principals of Eldorado Chemical Company decided that this supply could not always be insured and Eldorado Chemical Company, through research in their laboratory, was able to nearly duplicate Thiopenol. In December, 1975, Eldorado Chemical Company leased property in Bandera, Texas, the [redacted] Ranch, at an annual cost of \$1,500. On that property, Eldorado Chemical set up a \$450 used still to begin distilling Thiopenol. Some product was then produced by Eldorado Chemical Company until Eldorado Chemical Company entered into an agreement with [redacted] of R. M. Hughes Company to manufacture Thiopenol at the [redacted] Ranch site. [redacted] redesigned the still unit at the [redacted] Ranch and with the help of Eldorado Chemical Company began manufacturing the Thiopenol which was now called Thioacten. Since that time, the lease on the [redacted] Ranch and the fixtures and equipment at that site, which had been originally secured by Eldorado Chemical Company, was given to R. M. Hughes Company. Subsequently, R. M. Hughes Company has abandoned the [redacted] Ranch site. Throughout the contract periods, R. M. Hughes was the sole supplier of Thioacten to Eldorado Chemical.

In interviews with [redacted] and [redacted] of Eldorado Chemical Company, they advised that in addition to producing Thioacten, R. M. Hughes also distills and reclaims spent solvent from McClellan AFB, for Eldorado Chemical Company. In an interview with [redacted] prior to the time of the interview with the principals of Eldorado Chemical [redacted] steadfastly denied that R. M. Hughes reclaims dispense solvent for Eldorado.

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On August 11, 1980, [redacted] McClellan AFB, California, advised that she traveled to R. M. Hughes in San Antonio, Texas on February 1, 1979, in an effort to obtain cost or pricing data from R. M. Hughes which would permit the Government to determine the reasonableness of contract costs involving a current Eldorado Chemical proposal for the desealing of F-111 aircraft. [redacted] further stated that [redacted] was most secretive of the chemicals and sources of chemicals used during the manufatur of Thioacten and would not provide her with the chemical names or the source names. However, [redacted] did provide [redacted] with material cost per pound to produce Thioacten based on the chemicals used, which were cloaked by the means of numbers one through eight. [redacted] was shown invoices for five of the eight components which had the chemical names and source names blocked out. At the time of her interview, [redacted] furnished a copy of her notes regarding her visit to R. M. Hughes. From the information provided by [redacted] and information learned through other investigation, the Sacramento Office of the FBI was able to decipher [redacted] formula for Thioacten. A comparison of [redacted] formula for Thioacten and Eldorado Chemical Company's original Thioacten formula revealed that [redacted] formula was

b6
b7C

[redacted]

approximately 200 pounds heavy with regard to the most expensive component, Thiopenol. This additional 200 pounds would result in an overall increase in cost to the Government of Thioacten from \$2.44 per pound to \$3.83 per pound. In that Thioacten accounts for approximately 25% of the total contract price, and that the total cost of the contracts awarded Eldorado Chemical Company during the past five years for the desealing of the F-111 is approaching \$8 million, the loss to the Government from this 200 pound addition of Thiopenol to the formula can be estimated at approximately \$800,000.

Interviews with former employees and still operators of R. M. Hughes Company revealed that the still at Bandera, Texas was used by R. M. Hughes Company exclusively in the reclaiming of spent solvent from the F-111 desealing process at McClellan AFB. Interviews with employees revealed that at no time, did they mix new materials and distill Thioacten at the [redacted] Ranch.

An interview with a former employee of R. M. Hughes Company in San Antonio, Texas, revealed that [redacted] had confided in this employee that he was purchasing Thioacten from a Mexican National and was importing the Thioacten to be used in the F-111 project from Mexico, paying the Mexican National in cash. The former employee of R. M. Hughes remarked that [redacted] and [redacted] were always talking about how much money they were making on the F-111 project.

Currently this matter is being presented to the Federal Grand Jury, Eastern District of California, Sacramento, California, for their consideration. The FBI is pursuing leads with the U. S. Customs Service regarding the importation of chemicals from Mexico for use in the F-111 project.

YB

Airtel

Unclassified

10/13/82

b6
b7C

Director, FBI (206-76)

SAC, Sacramento (206A-12)

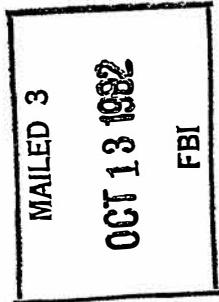
[REDACTED]

ET AL;
FAG - DOD (USAF - CONTRACT FRAUD)
OO: SACRAMENTO

Re Bureau airtel to Sacramento dated July 13, 1982.

Referenced communication advised Sacramento of a request by the Defense Contract Audit Agency (DCAA) for the current status of the captioned investigation and instructed Sacramento to immediately submit an LHM setting forth a summary of the case and the prosecutive status. To date, no communication from Sacramento has been received at FBIHQ regarding this matter.

Sacramento is instructed to submit an LHM, suitable for dissemination to DCAA, by COB October 22, 1982. The LHM should set forth a summary of the case to date and the current prosecutive status.



1 - [REDACTED]

(4)

Exec AD Adm. _____
Exec AD Inv. _____
Exec AD LES _____
Asst. Dir.:
 Adm. Servs. _____
 Crim. Inv. _____
 Ident. _____
 Insp. _____
 Intell. _____
 Lab. _____
Legal Coun. _____
Off. Cong. &
 Public Affs. _____
Rec. Mgmt. _____
Tech. Servs. _____
Training _____
Telephone Rm. _____
Director's Sec'y _____

Rm 3149
10/13/82
MAIL ROOM

(4)

206-76-10

13 OCT 13 1982

FBI

TRANSMIT VIA:

- Teletype
 Facsimile
 AIRTEL

- PRECEDENCE:
 Immediate
 Priority
 Routine

CLASSIFICATION:

- TOP SECRET
 SECRET
 CONFIDENTIAL
 UNCLAS E F T O
 UNCLAS

Date 10/22/82b6
b7C

TO: DIRECTOR, FBI
 FROM: SAC, SACRAMENTO (206A-12) (P)
 SUBJECT: [REDACTED]

ET AL;
 FAG - DOD (USAF - CONTRACT FRAUD)
 OO: SC

Re SC airtel and LHM to Bureau dated 8/20/82; Bureau
airtel to SC dated 10/13/82.

Enclosed for the Bureau is one copy of referenced
 Sacramento airtel and LHM to Bureau dated 8/20/82.

(2) Bureau (Enc. 2)
 1cc-mde
 2 - Sacramento
 RPP/ab
 (4)

ENCLOSURE

1 - Defense Contract
 Audit Agency
 ATTN: [REDACTED]
 10/12/82
 L.A.P./G.P.

10 OCT 26 1982

Approved: _____ Transmitted _____ Per _____

FBI

TRANSMIT VIA:

- Teletype
 Facsimile
 AIRTEL

PRECEDENCE:

- Immediate
 Priority
 Routine

CLASSIFICATION:

- TOP SECRET
 SECRET
 CONFIDENTIAL
 UNCLAS E F T O
 UNCLAS

Date 8/20/82

TO: DIRECTOR, FBI (206-76)
 FROM: SAC, SACRAMENTO (206A-12) (P)
 SUBJECT:

EL AT
 FAG - DOD (USAF CONTRACT FRAUD)
 OO: SC

b6
b7C

Re Bureau airtel dated 7/13/82.

Enclosed for the Bureau are five copies of an LHM regarding the captioned matter, dated 8/20/82.

2 - Bureau (Enc. 5)

2 - Sacramento

RPP/ab

(4)

206A-12-127

Approved: _____

Transmitted 11 (Number) (Time)

Per _____

FBI

b6
b7c

TRANSMIT VIA:

- Teletype
 Facsimile
 AIRTEL

- PRECEDENCE:
 Immediate
 Priority
 Routine

- CLASSIFICATION:
 TOP SECRET
 SECRET
 CONFIDENTIAL
 UNCLAS E F T O
 UNCLAS.

Date 5/18/83

TO: DIRECTOR, FBI (206A-76)
 FROM: 71 SAC, SACRAMENTO (206A-12) (C)
 SUBJECT: [REDACTED]

ET AL
 FAG (DOD)
 OO: Sacramento

Enclosed for the Bureau are four copies of self-explanatory LHM.

The United States Attorney's opinion is being confirmed by separate communication.

1 - Defense Contract Audit Agency
 ATTN: [REDACTED]
 1 - DOJ/DOD FRAUD TASK FORCE
 ATTN: [REDACTED]
 1 - CIVIL 206-16-12
 1 - OSI, USAF

② Bureau (Enc. 4) *cc: MPE* *7/10* **ENCLOSURE**
 1-Sacramento
 CLC:js
 (3)

78/GP
6/18/83
 12 JUN 7 1983

54 JUL 5 1983

Approved: _____ Transmitted _____ Per _____
 (Number) (Time)



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. SC 208A-12

Sacramento, California
May 18, 1983

b6
b7C

[Redacted]
AND OTHERS,
FRAUD AGAINST THE GOVERNMENT -
DEPARTMENT OF DEFENSE

In 1973, El Dorado Chemical Company became interested in the desealing of F-111 fighter/bomber fuel cavities. El Dorado Chemical Company became involved in a competition conducted by General Dynamics Corporation to decide which firm could most effectively deseal the F-111. At the end of this competition, El Dorado Chemical Company was given sole source status, as the only contractor who could deseal the F-111 as per Air Force requirements.

The Air Force subsequently performed an audit covering the period November 6, 1975, to December 31, 1977, concerning this sole source contract and exception was taken to the amount of desealing chemical being used in comparison with the amount of being built by the contractor, reuse of desealing liquids in violation of the contract terms. and reuse of the metal barrel containers in shipping the desealing liquids.

On April 22, 1983, Assistant United States Attorney George L. O'Connell advised that he had reviewed the subject contracts for which an audit was performed covering the period November 6, 1975, to December 31, 1977, and determined that the applicable statutes of limitations for false claim against the government is five years and accordingly the statute of limitations would bar criminal prosecution in this matter. He stated the Air Force should attempt recover any over payments either administratively or civilly from the contractor as soon as possible.

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

208-76-12
ENCLOSURE

[Redacted]

b6
b7C

Assistant United States Attorney O'Connell advised in view of the above facts that he was declining consideration of any criminal prosecution in this matter.

FBI # 206-76

TO BE PLACED IN BULKY EXHIBITS

BEHIND FILE

FBI #206-76

LAB # 10311023-VI

b6
b7C

FILE #: 206-76
CONTENTS LAB WORKSHEET ITEMS

DO NOT STAMP OR HANDLE AS ENCLOSURE

FBI

TRANSMIT VIA:

Teletype
 Facsimile
 AIRTEL

PRECEDENCE:
 Immediate
 Priority
 Routine

CLASSIFICATION:
 TOP SECRET
 SECRET
 CONFIDENTIAL
 UNCLAS E F T O
 UNCLAS

b6
b7CDate 4/7/81

TO: DIRECTOR, FBI (206A-76) (Attn: FBI LABORATORY)

FROM: SAC, SACRAMENTO (206A12) (P)

SUBJECT: [REDACTED]

E

Et Al

 Eldorado Chemical Company, Inc.

San Antonio, Texas

FAG - DOD (USAF) (A)

OO: SC

Re telcall of SA [REDACTED] Laboratory Division,
 to SA [REDACTED] Sacramento, 3/27/81.

Enclosed under separate cover for the Bureau, Laboratory Division, is a 10 milliliter sample of SR-51A taken from the Eldorado Chemical Company desealing site at McClellan Air Force Base on 4/6/81.

Referenced telephone call with SA [REDACTED] revealed that the sample of SR-51A submitted by the Sacramento Division on 3/6/81 contained no thiophenol. Subsequently, the Sacramento Division obtained another sample of SR-51A to be retested.

A review of the case file at Sacramento indicates that "Thioacten" is simply a trade name given a thio distillate or mercaptan mixture produced by R.M. Hughes Company. Sacramento believes that the large variances allowed and the primitive methods employed by the R.M. Hughes Company and the Eldorado Chemical in the manufacture of thioacten and the

3 - Bureau
 (2- 206A-76)
 (1- Package Copy)
 2 - Sacramento
 RPP:mml
 (5)

Approved: _____ Transmitted _____ Per _____
 (Number) (Time)

SC 206A-12

SR chemicals makes it virtually impossible to ascertain if thioacten and thiophenol are identical. In the same respect, the Sacramento Division has not been able to determine if a di-phenyl di-sulfide is used by Eldorado or R.M. Hughes in the manufacturing of the SR chemicals.

LEADS:

The Chemistry Lab is requested to analyze the submitted sample of SR-51A and determine the mercaptan content.

Sacramento is still interested in determining the size of a distillation unit needed to produce thioacten according to [redacted] formula (see referenced airtel).

b6
b7C

FBI

TRANSMIT VIA:

- Teletype
- Facsimile
- AIRTEL

PRECEDENCE:

- Immediate
- Priority
- Routine

CLASSIFICATION:

- TOP SECRET
- SECRET
- CONFIDENTIAL
- UNCLAS E F T O
- UNCLAS

Date 3/6/81

TO: DIRECTOR, FBI (206A-76)
 FROM: SAC, SACRAMENTO (206A-12) (P)
 SUBJECT: CUNICEN

b6
b7C

[REDACTED]
 Eldorado Chemical Company, Inc.
 6700 Lookout Road
 San Antonio, Texas.

[REDACTED]
 R. M. Hughes and Company, Inc.
 614 South Medina,
 San Antonio, Texas
 FAG - DOD (USAF - CONTRACT FRAUD) (A)
 OO: Sacramento

ENCLOSURE: MINUTEMAN HOUR

Enclosed under separate cover for the Bureau, Laboratory Division, are three one pint containers of chemicals known as SR-51, SR-51A, and GD-500. DE 38

R

Enclosed with this communication are items taken from the files of the Texas Air Resources Board (TARB) regarding the operation of the R. M. Hughes and Company, Inc. (Hughes) Distillation Unit used to manufacture thioacten (a trade name for a special thiophenol). Background material regarding the nature of the chemicals enclosed under separate cover, derived from Air Force contract files has been provided. In addition, a photograph of the Hughes Distillation Unit located in Bandera, Texas, is included.

2 MAR 21 1981

The title is marked changed to include aliases of the subjects and to correct the spelling of the subject firms involved.

3-Bureau (Encl. 3) (2-206A-76)

(1-Package)

2-Sacramento

RPP:js

ONLY

Transmitted

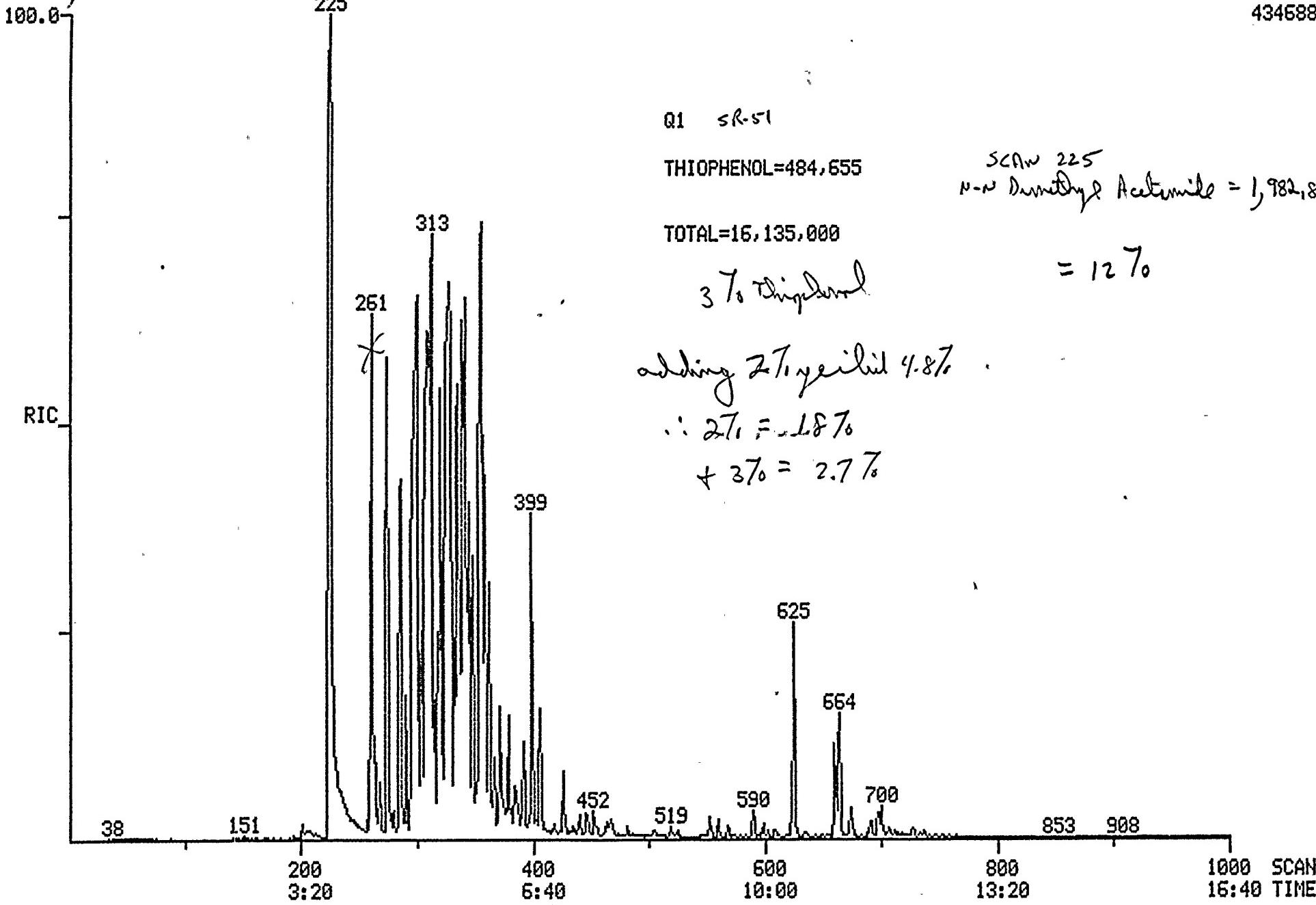
Per

(Time)

RIC
03/25/81, 9:56:00
SAMPLE: Q1 OV101 CAP 60-265
RANGE: G 1,1101 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL1 #1
CALI: CAL15 #2

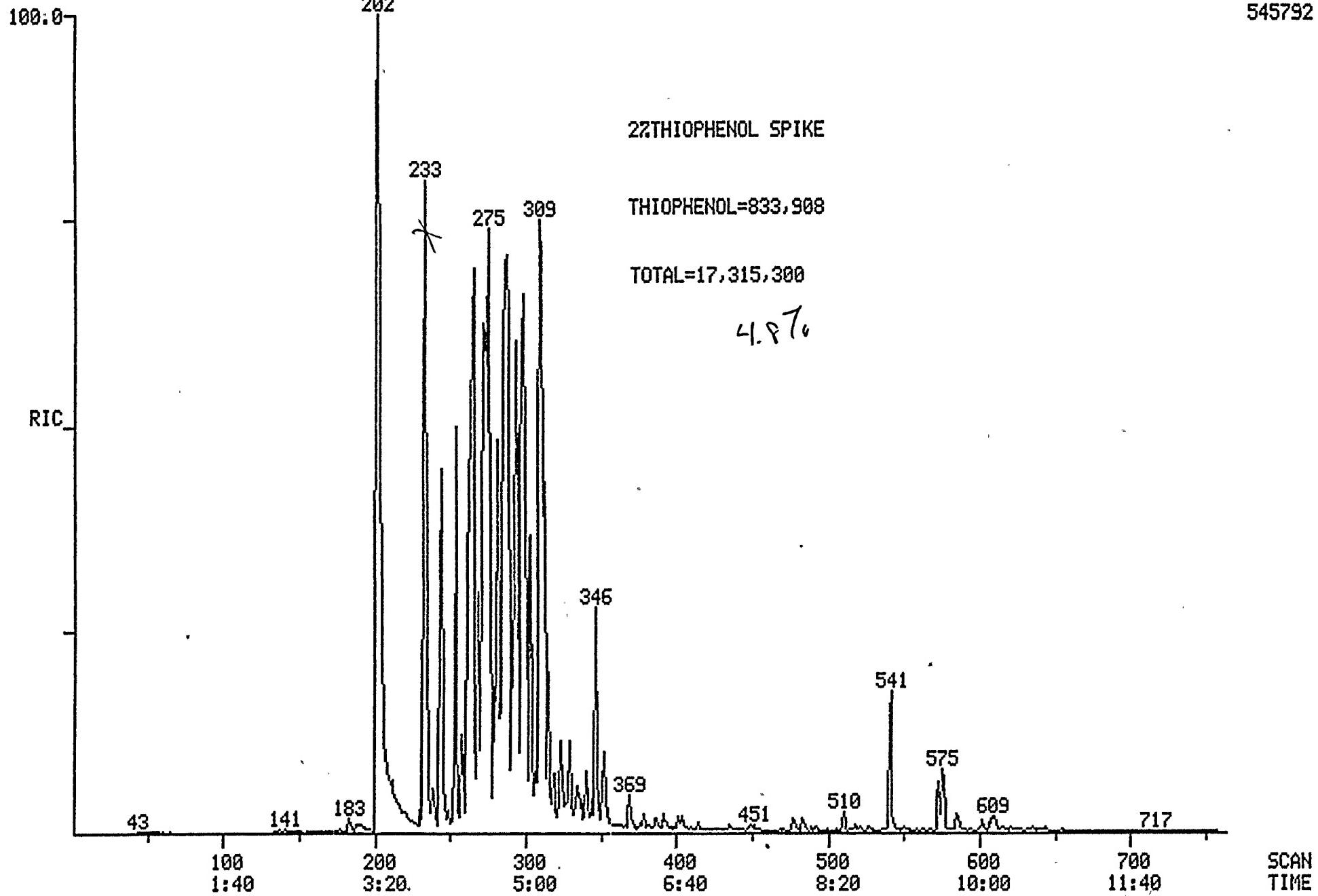
SCANS 1 TO 1000



RIC
03/26/81 14:50:00
SAMPLE: Q1 +2²THIOPHENOL
RANGE: G 1, 763 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: VY51SPIKE #1
CALI: CAL312 #3

SCANS 1 TO 763



RIC + MASS CHROMATOGRAMS

03/25/81 9:56:00

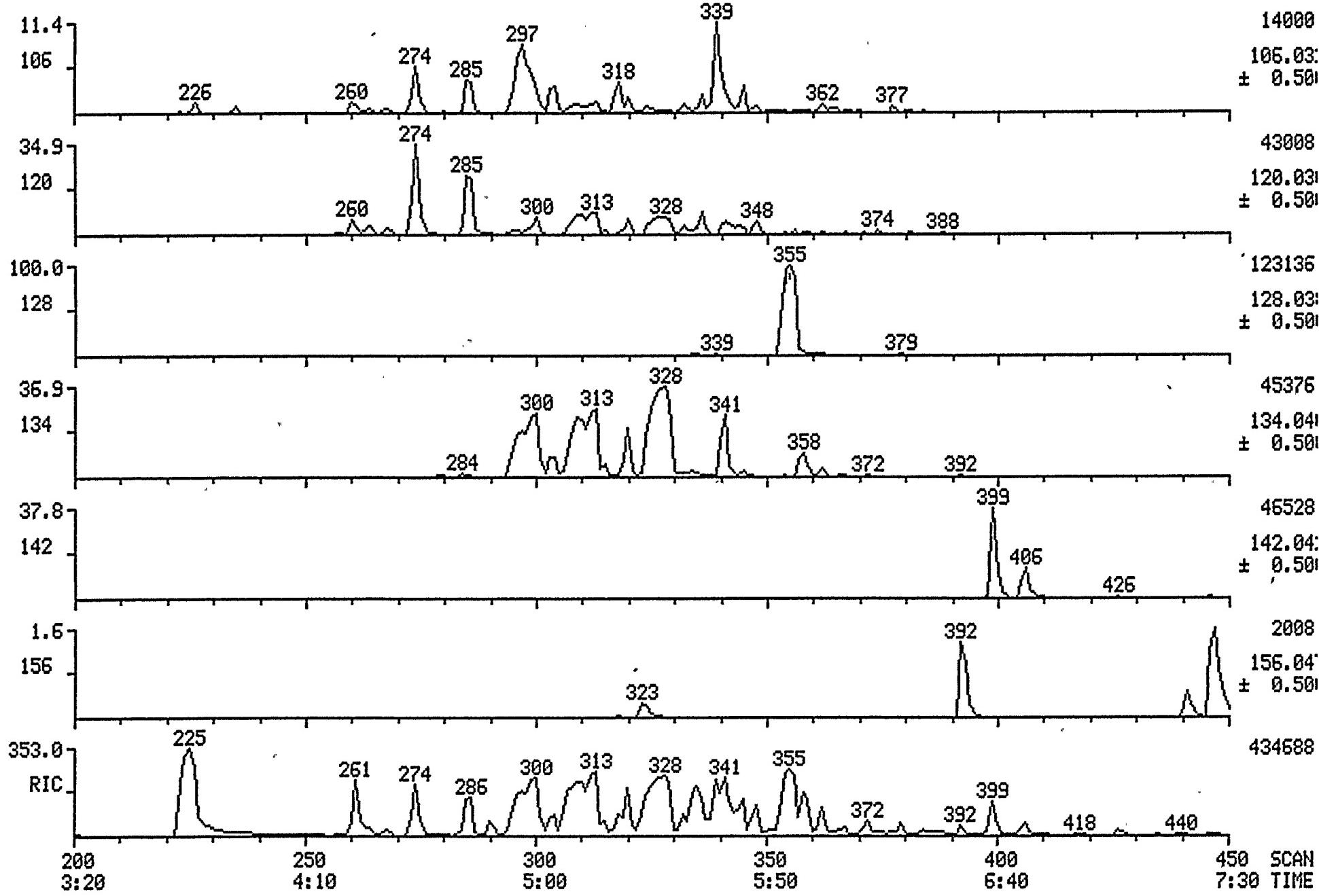
SAMPLE: Q1 OV101 CAP 60-265

RANGE: G 1,1101 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL1 #399

CALI: CAL15 #2

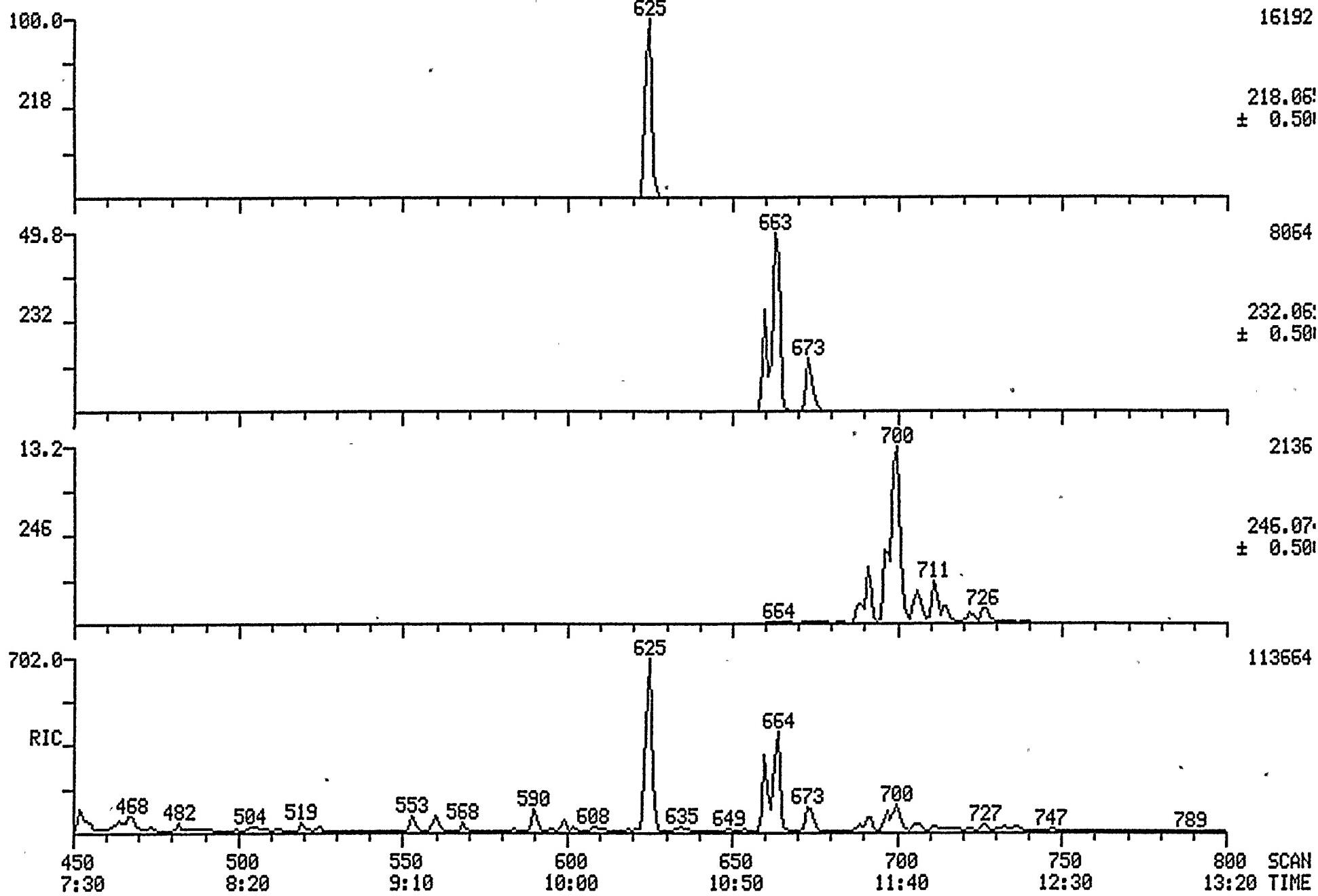
SCANS 200 TO 450



RIC + MASS CHROMATOGRAMS
03/25/81 9:56:00
SAMPLE: Q1 OV101 CAP 60-265
RANGE: G 1,1101 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL1 #625
CALI: CAL15 #2

SCANS 450 TO 800

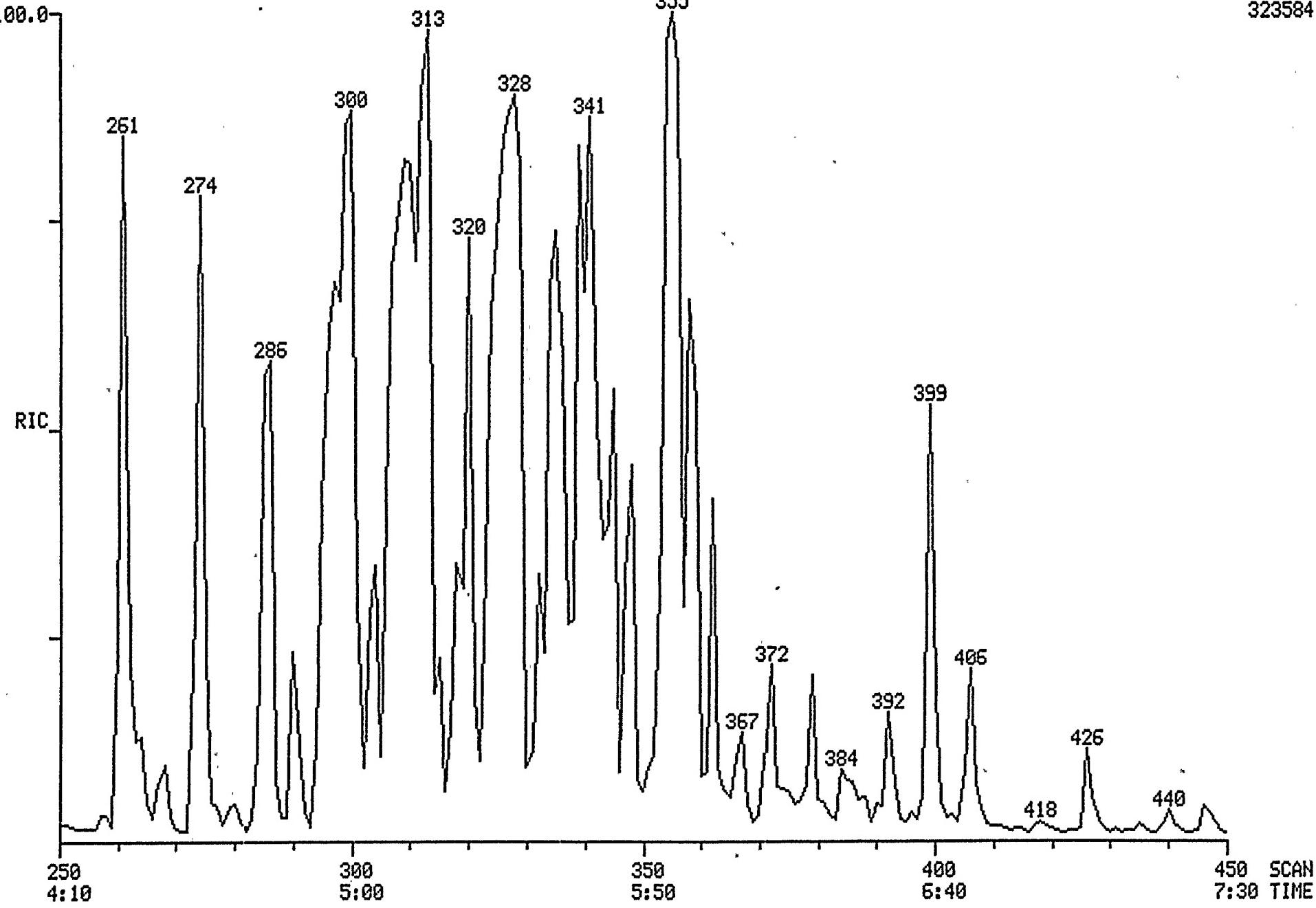


RIC
03/25/81 9:56:00
SAMPLE: Q1 OV101 CAP 60-265
RANGE: G 1,1101 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL1 #300
CALI: CAL15 #2

SCANS 250 TO 450

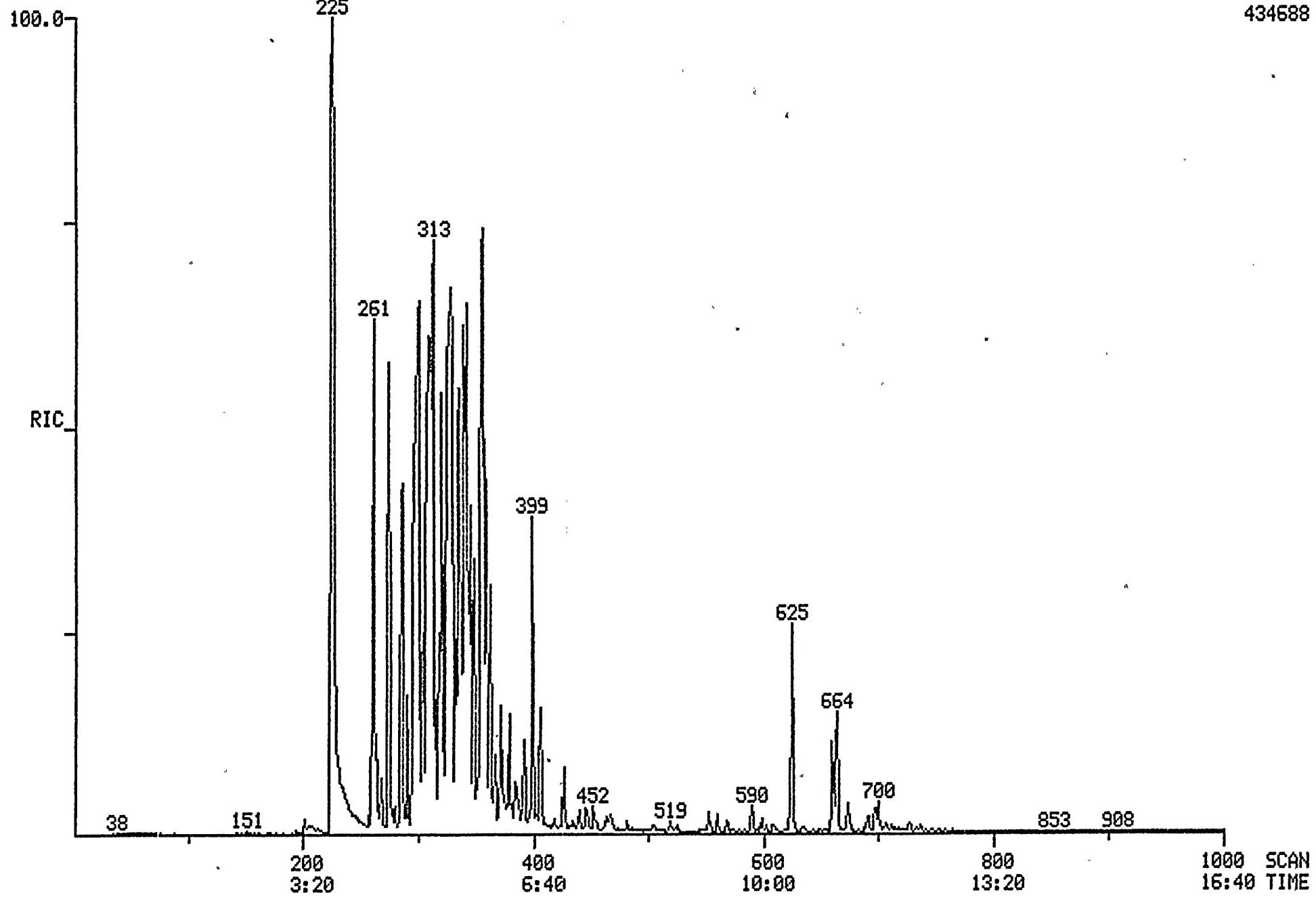
323584



RIC
03/25/81 9:56:00
SAMPLE: Q1 OV101 CAP 60-265
RANGE: G 1,1101 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL1 #1
CALI: CAL15 #2

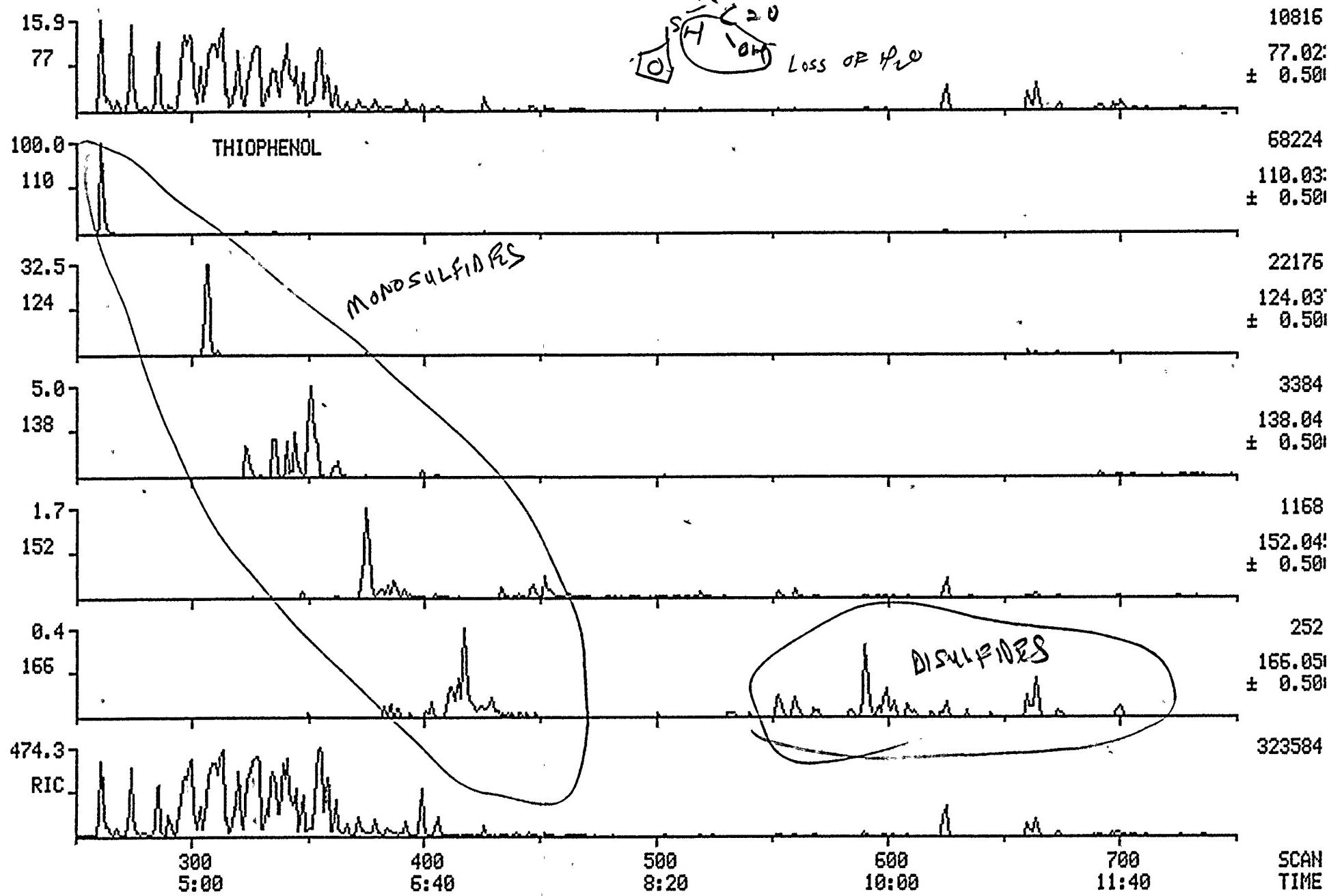
SCANS 1 TO 1000



RIC + MASS CHROMATOGRAMS
03/25/81 9:56:00
SAMPLE: Q1 OV101 CAP 60-265
RANGE: G 1,1101 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL1 #306
CALI: CAL15 #2

SCANS 250 TO 750

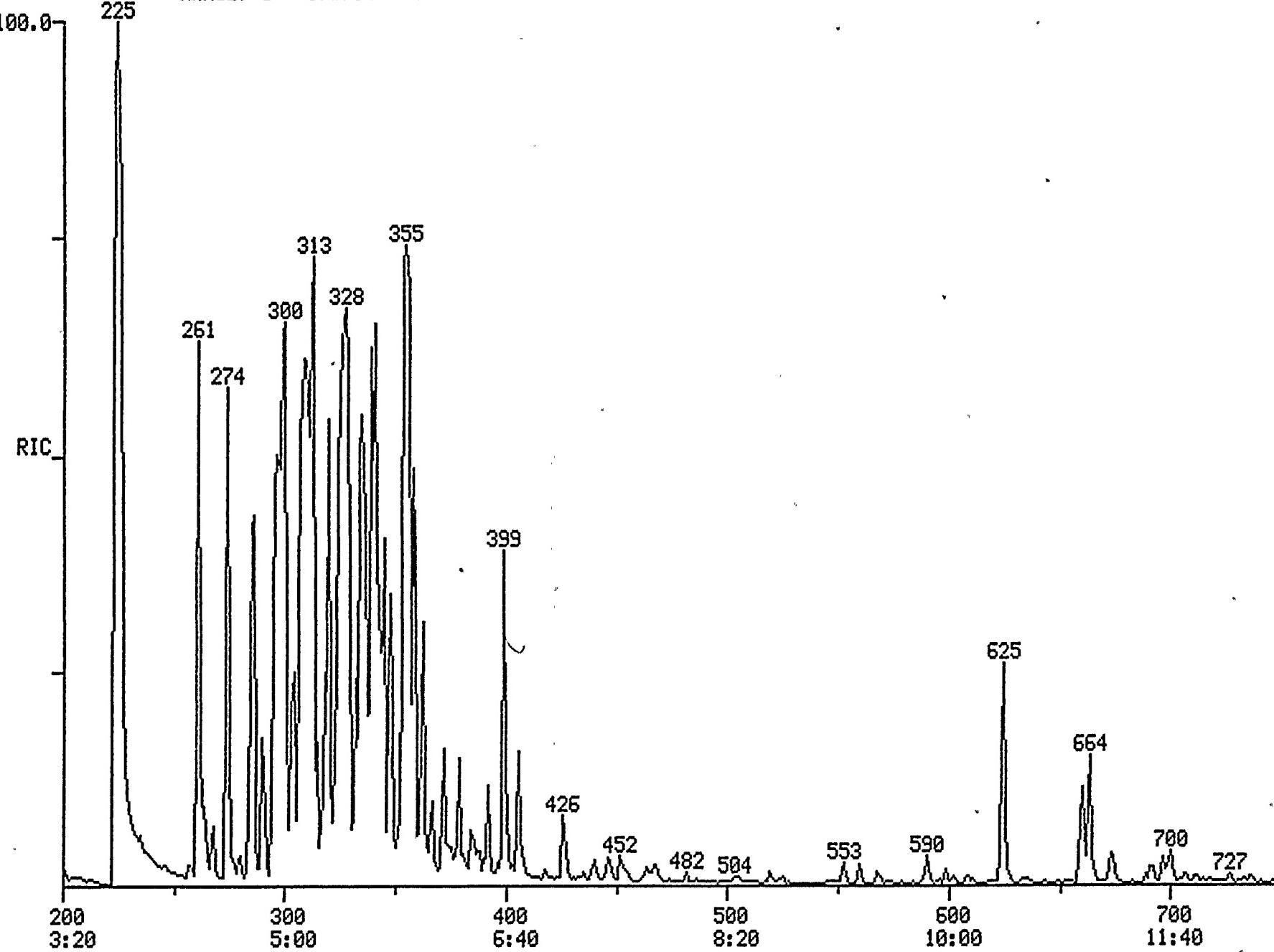


RIC
03/25/81 9:56:00
SAMPLE: Q1 OV101 CAP 60-265
RANGE: G 1,1101 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL1 #1
CALI: CAL15 #2

SCANS 200 TO 750

434588



RIC + MASS CHROMATOGRAM

03/25/81 9:56:00

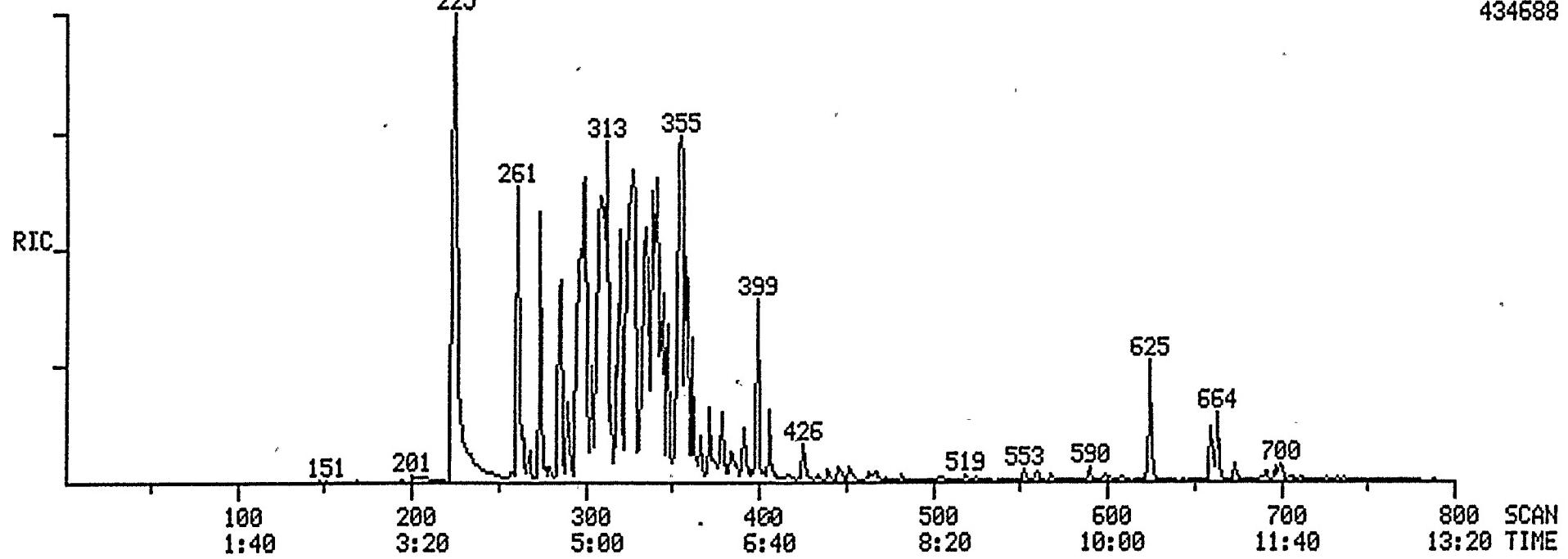
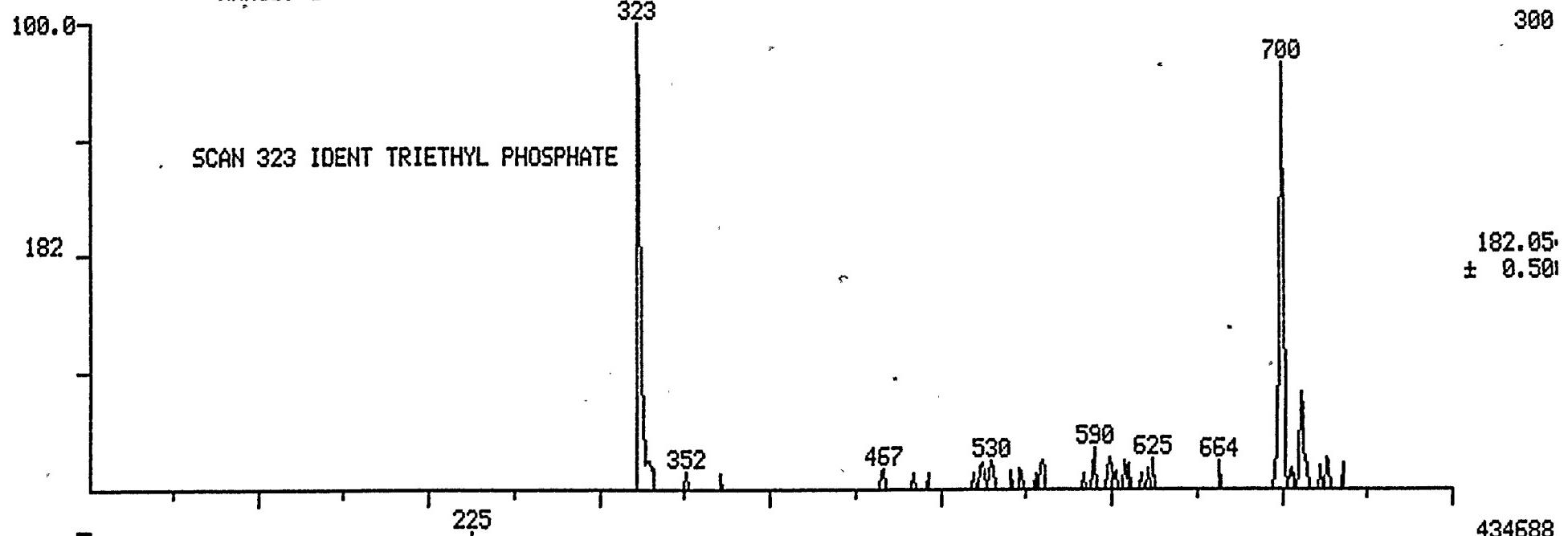
SAMPLE: Q1 OV101 CAP 60-265

RANGE: G 1,1101 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL1 #700

CALI: CAL15 #2

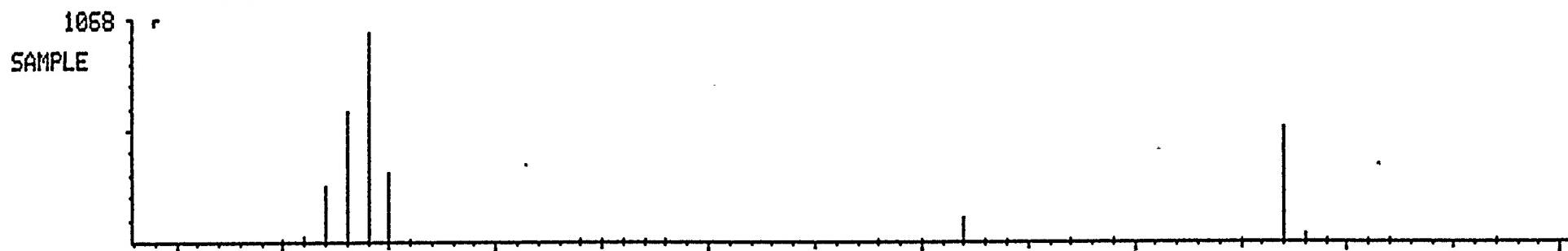
SCANS 1 TO 800



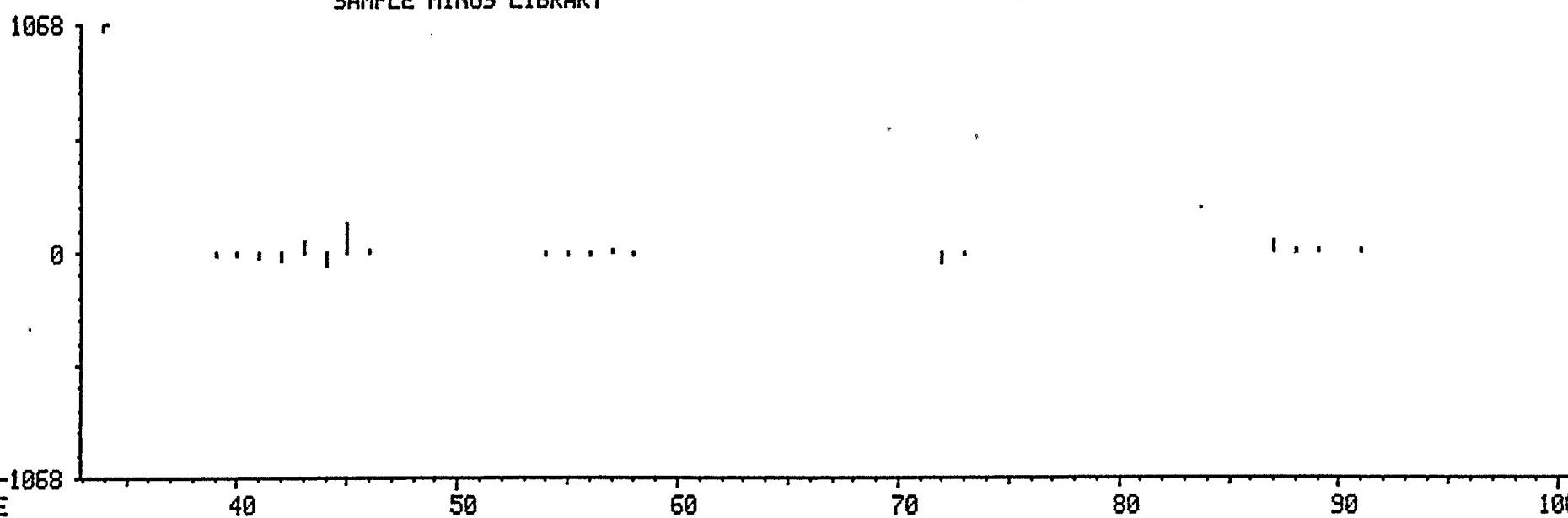
LIBRARY SEARCH
03/25/81 9:56:00 + 3:45
SAMPLE: Q1 OV101 CAP 60-265

DATA: KEL1 # 225
CALI: CAL15 # 2

BASE M/E: 44
RIC: 432127.



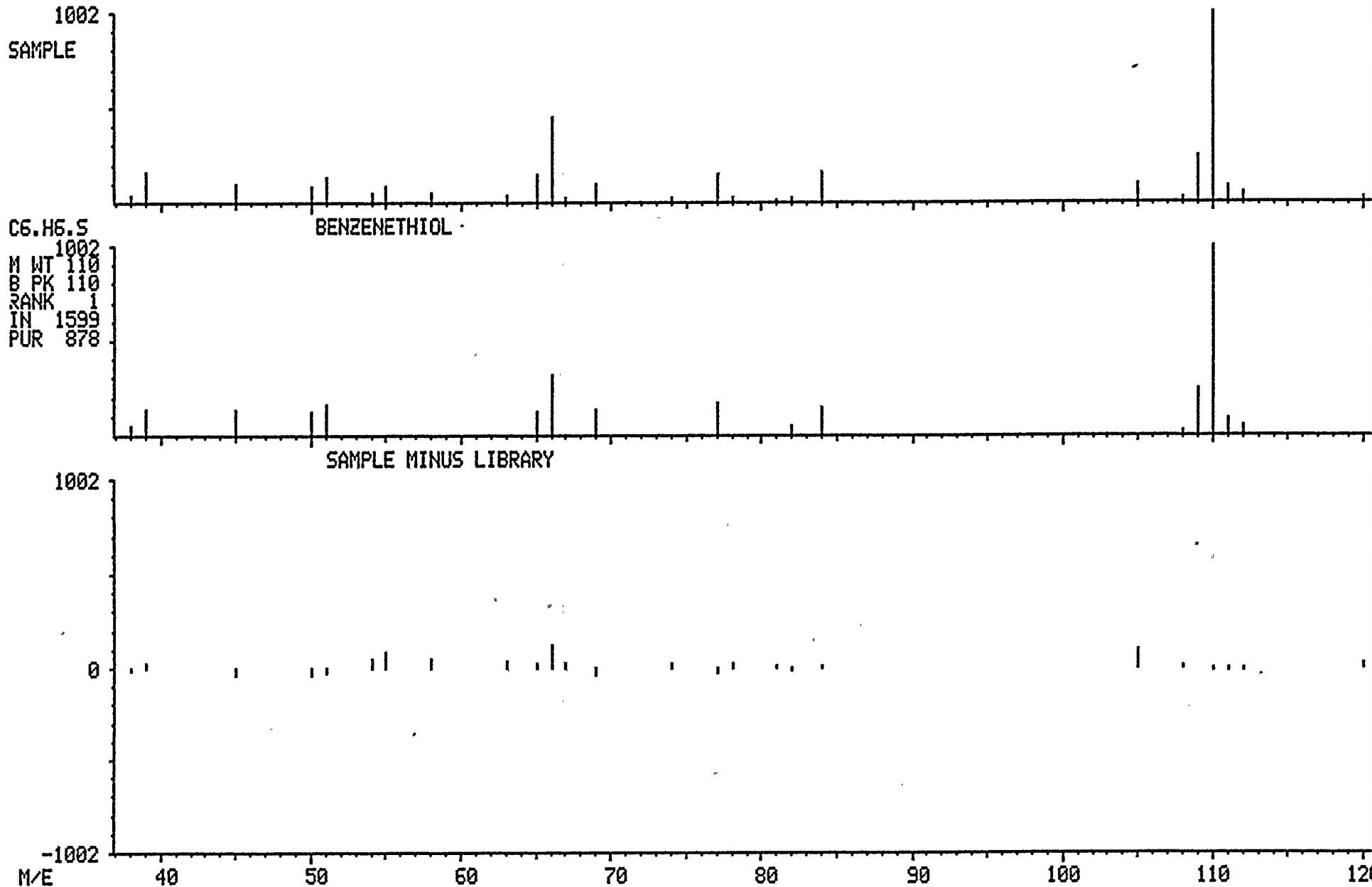
ACETAMIDE, N,N-DIMETHYL-



LIBRARY SEARCH
03/25/81 9:56:00 + 4:21
SAMPLE: Q1 0V101 CAP 60-265
261 - # 259 TO # 260 - # 262 TO # 263 X1.00

DATA: KEL1 # 261
CALI: CAL15 # 2

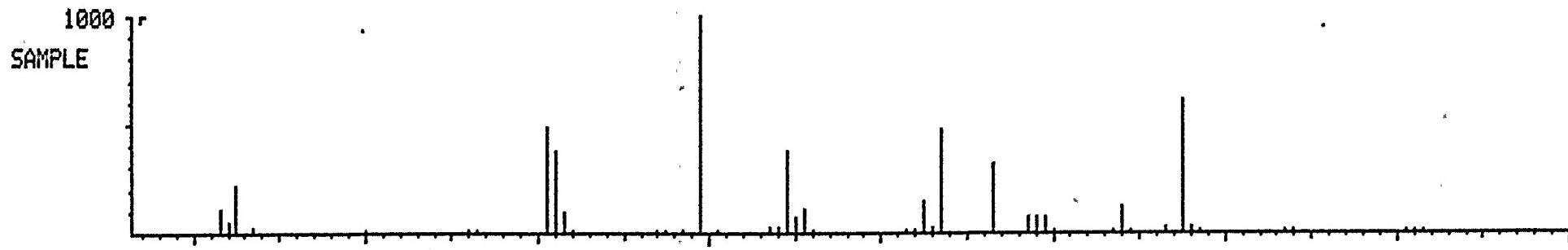
BASE M/E: 110
RIC: 207359.



LIBRARY SEARCH
03/25/81 9:56:00 + 5:23
SAMPLE: Q1 0V101 CAP 60-265
ENHANCED (S 158 2N 0T)

DATA: KEL1 # 323
CALI: CAL15 # 2

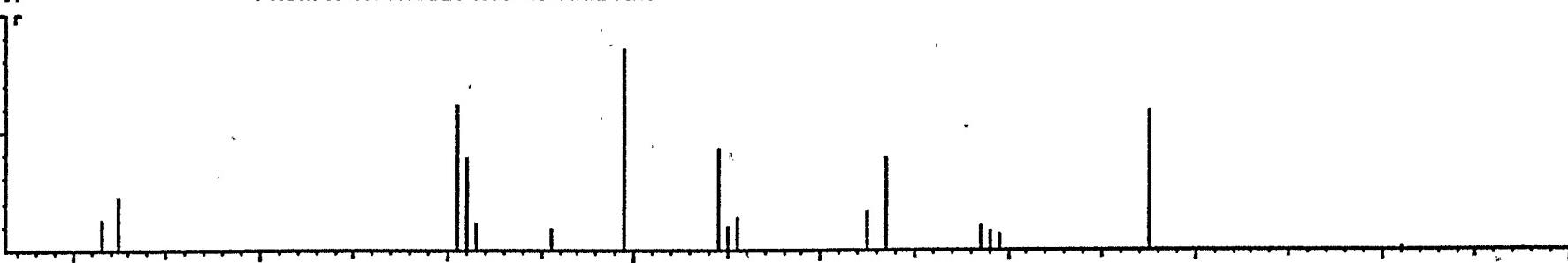
BASE M/E: 99
RIC: 59071.



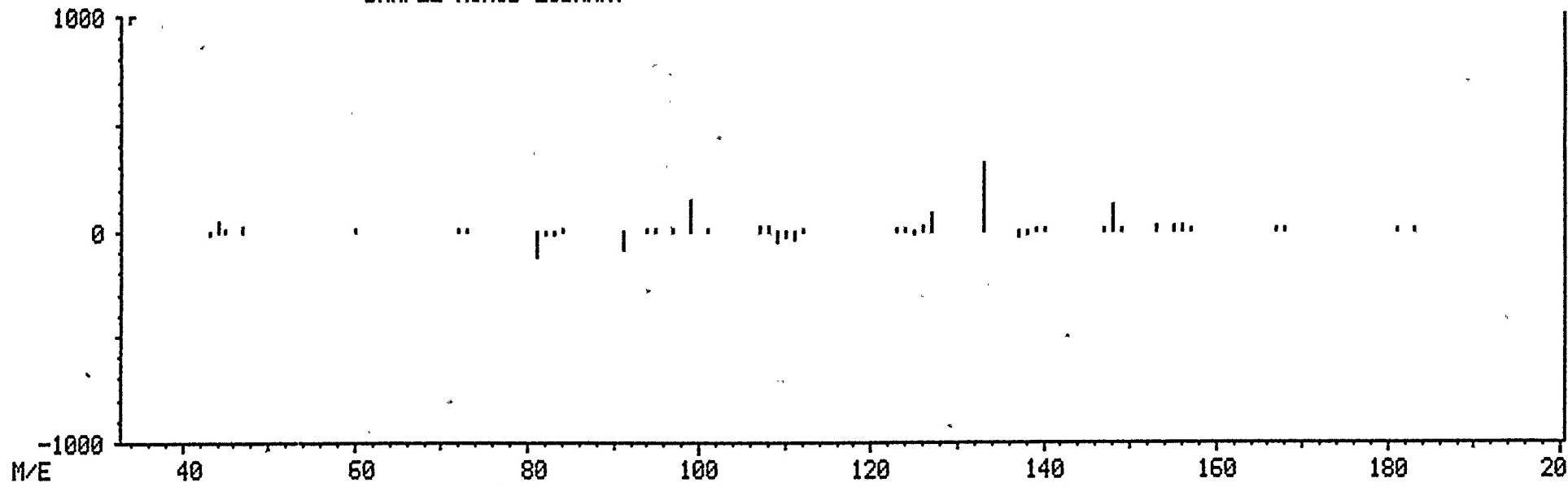
C6.H15.04.P

PHOSPHORICACID, TRIETHYLESTER

M WT 182
B PK 99
RANK 1
IN 10632
PUR 807



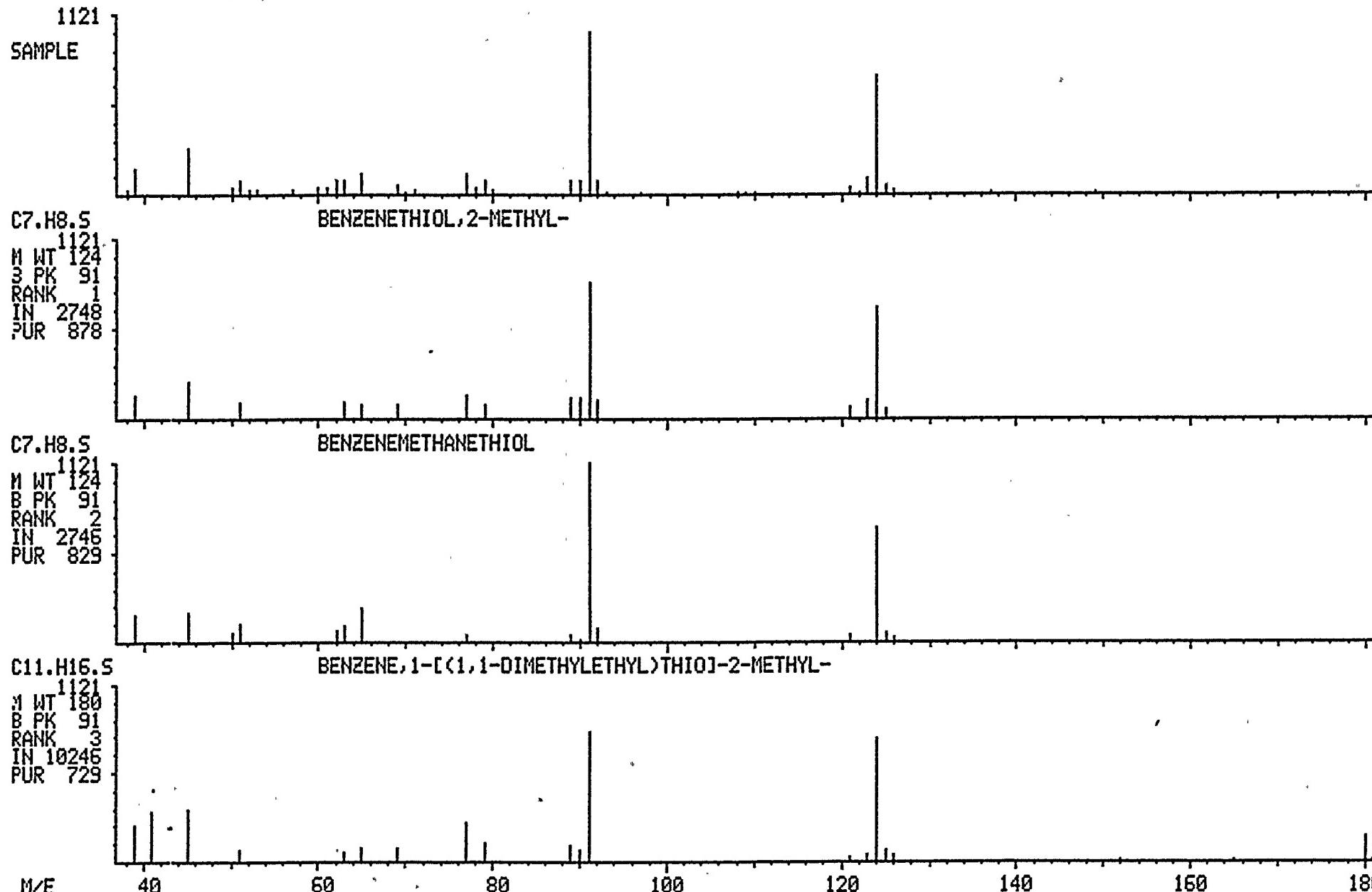
SAMPLE MINUS LIBRARY



LIBRARY SEARCH
03/25/81 9:56:00 + 5:07
SAMPLE: Q1 OV101 CAP 60-265
ENHANCED (S 158 2N 0T)

DATA: KEL1 # 307
CALI: CAL15 # 2

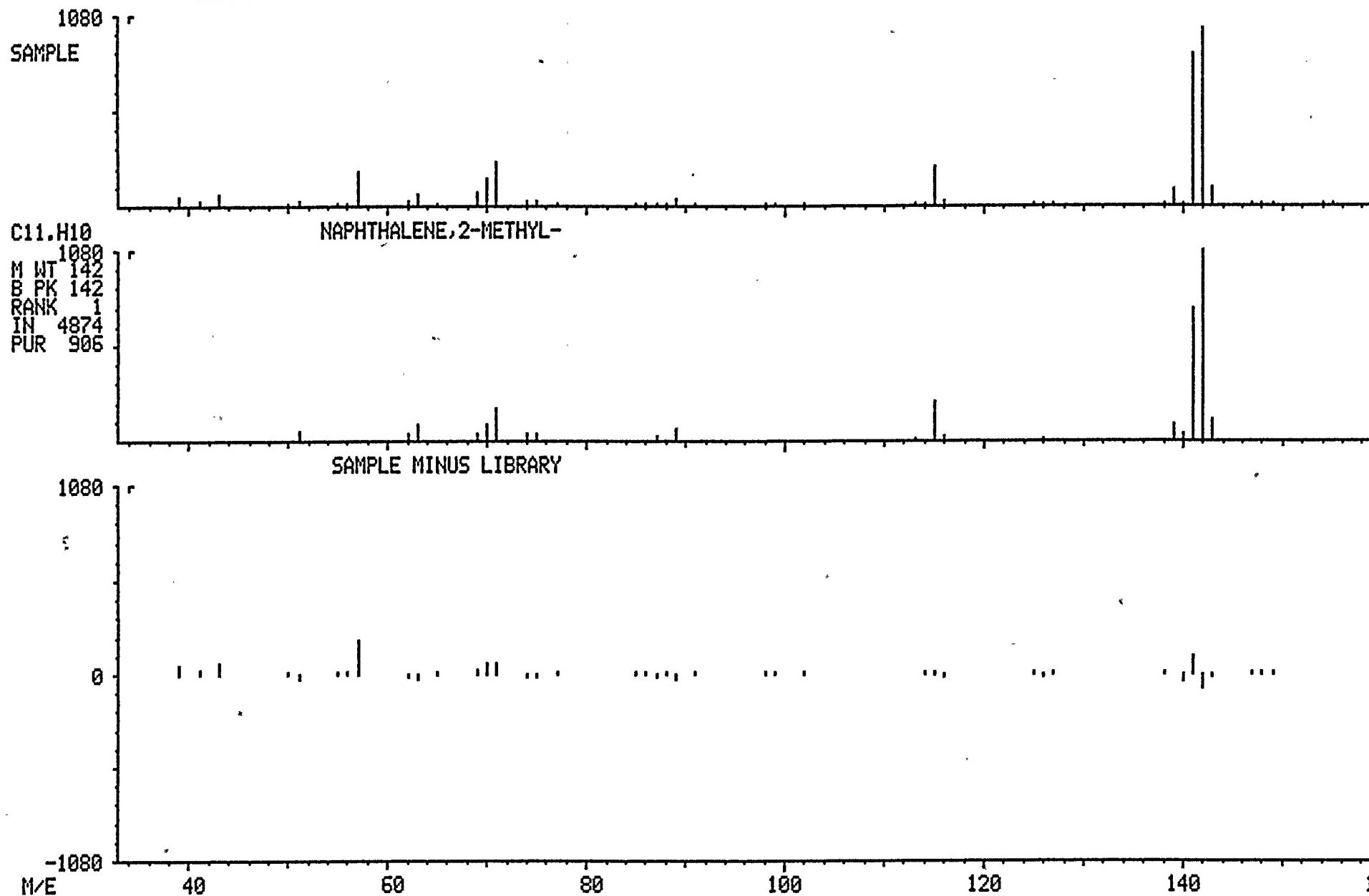
BASE M/E: 91
RIC: 102527.



LIBRARY SEARCH
03/25/81 9:56:00 + 6:39
SAMPLE: Q1 OV101 CAP 60-265
ENHANCED (5 158 2N 0T)

DATA: KEL1 # 399
CALI: CAL15 # 2

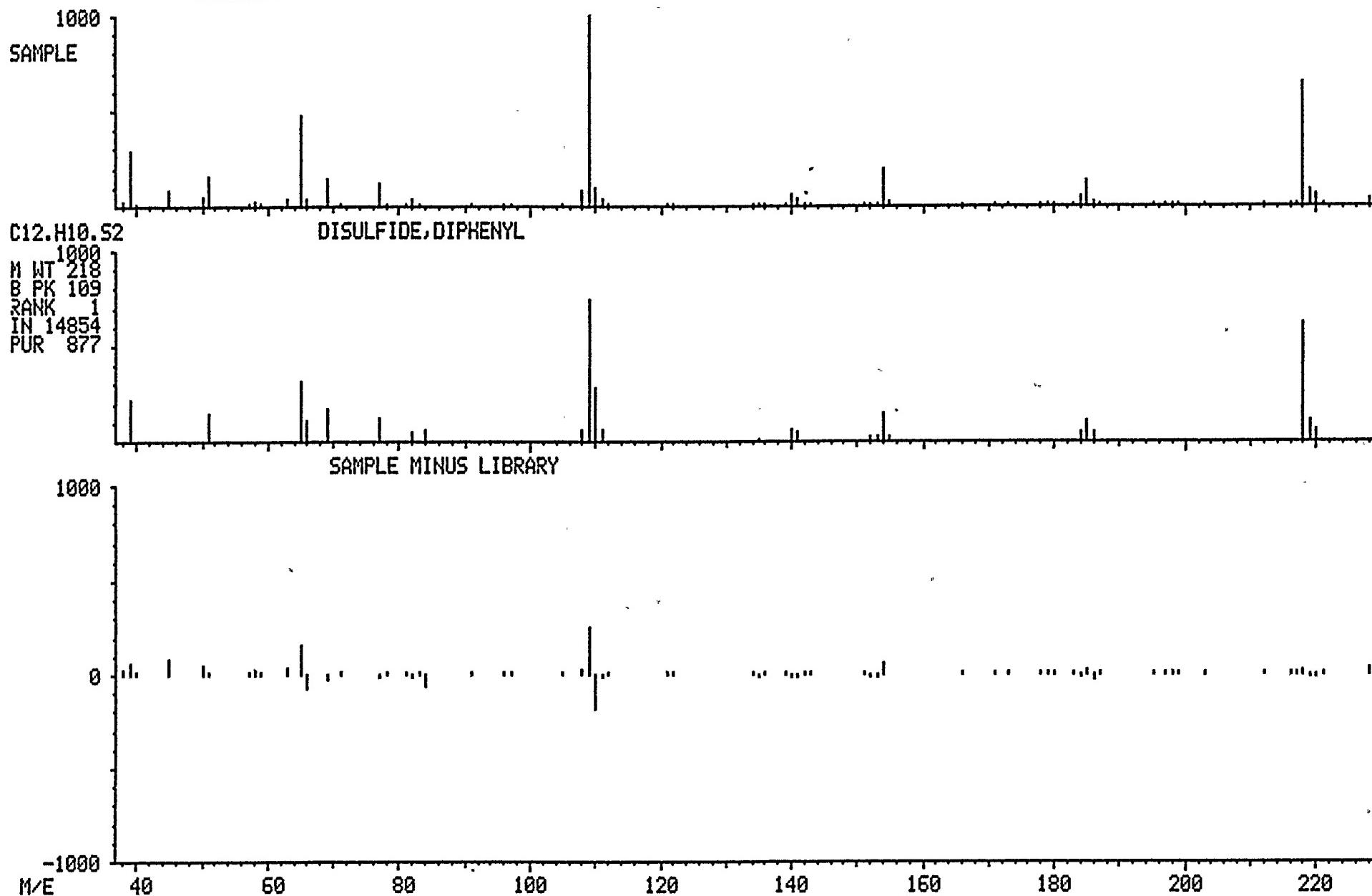
BASE M/E: 142
RIC: 97279.



LIBRARY SEARCH
03/25/81 9:56:00 + 10:25
SAMPLE: Q1 OV101 CAP 60-265
ENHANCED (S 15B 2N 0T)

DATA: KEL1 # 625
CALI: CAL15 # 2

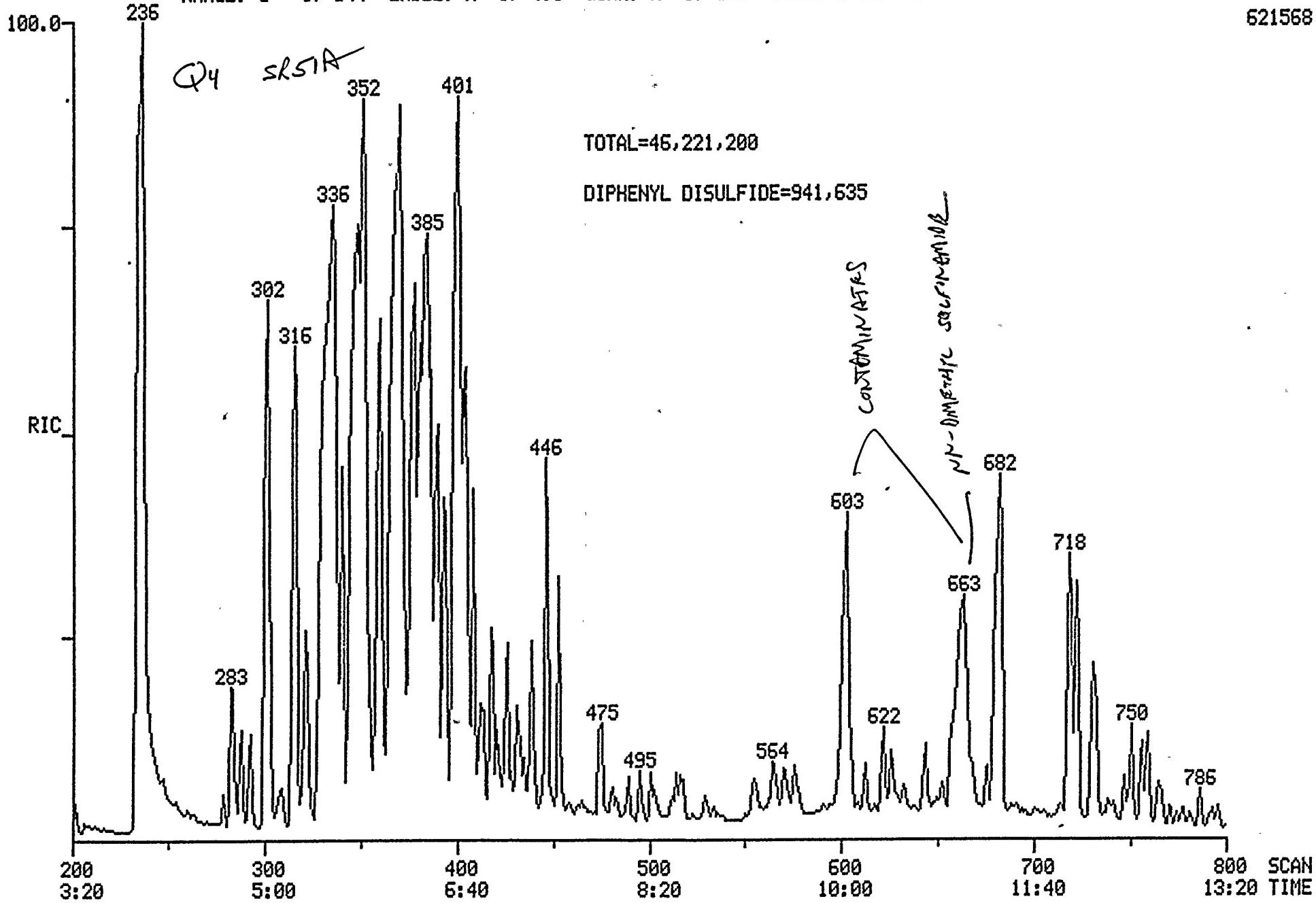
BASE M/E: 109
RIC: 84351.



RIC
05/14/81 10:06:00
SAMPLE: Q4
RANGE: G 1, 944 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: SR5104 #681
CALI: CAL331 #1

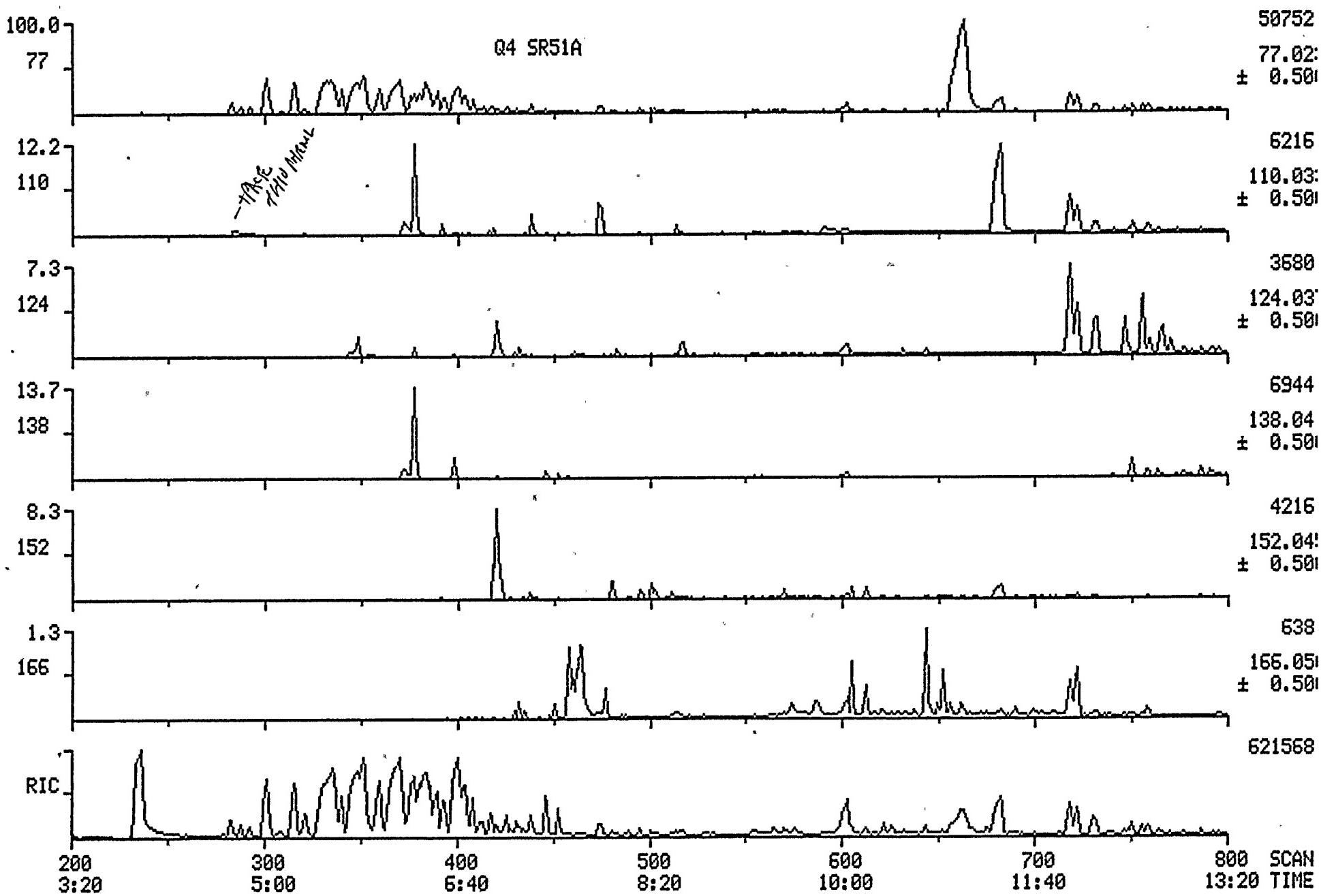
SCANS 200 TO 800



RIC + MASS CHROMATOGRAMS
05/14/81 10:06:00
SAMPLE: Q4
RANGE: G 1, 944 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: SR51Q4 #1
CALI: CAL331 #1

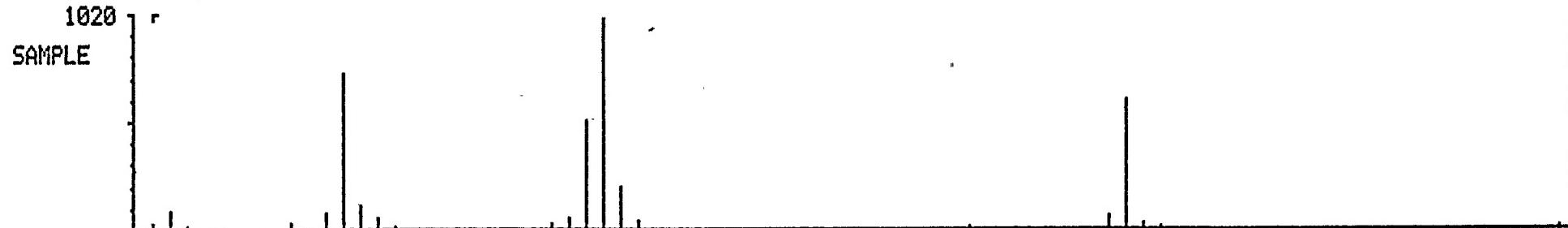
SCANS 200 TO 800



LIBRARY SEARCH
05/14/81 10:06:00 + 3:21
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

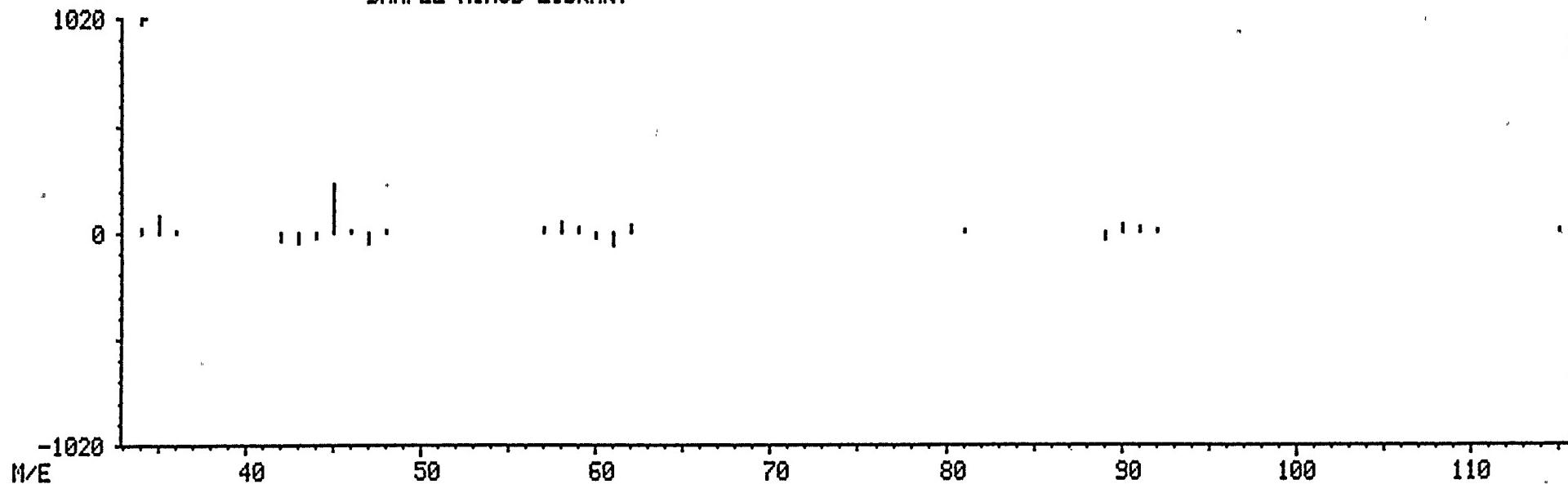
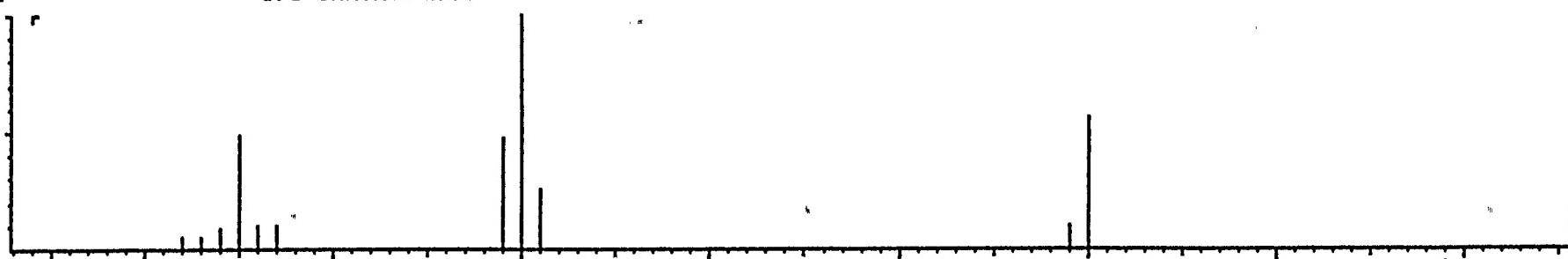
DATA: SR5104 # 201
CALI: CAL331 # 1

BASE M/E: 60
RIC: 14655.



C₃H₆O₅

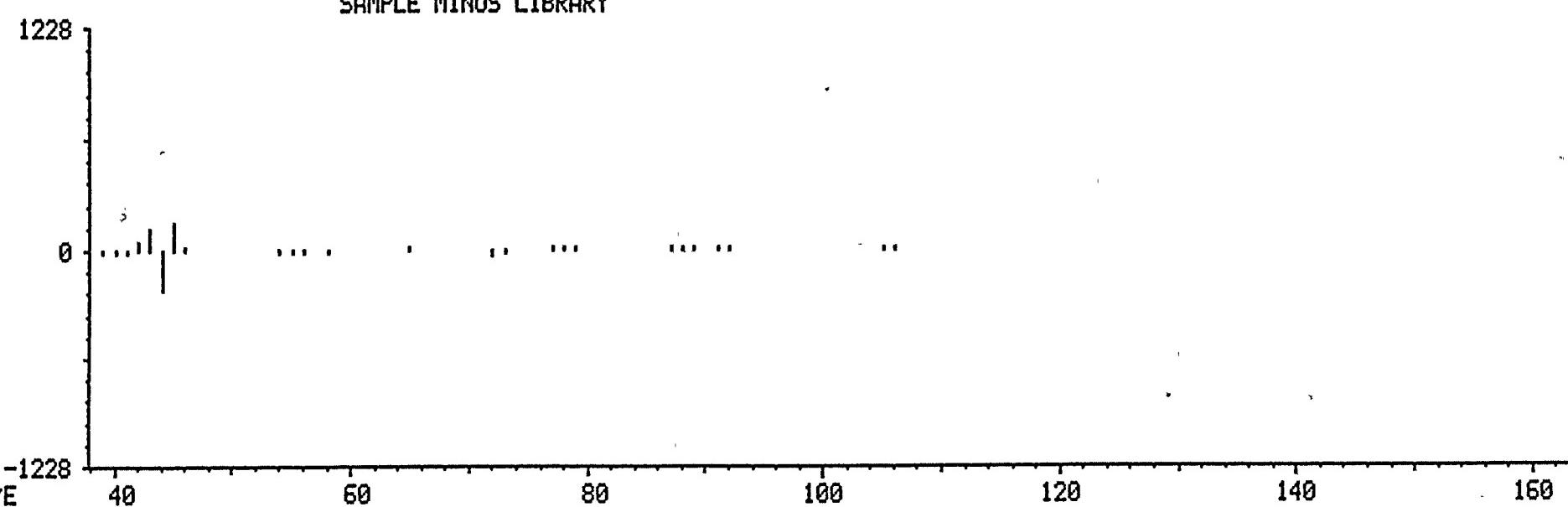
M	WT	1020
B	PK	90
RANK	1	60
IN	636	
PUR	913	



LIBRARY SEARCH
05/14/81 10:06:00 + 3:55
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 235
CALI: CAL331 # 1

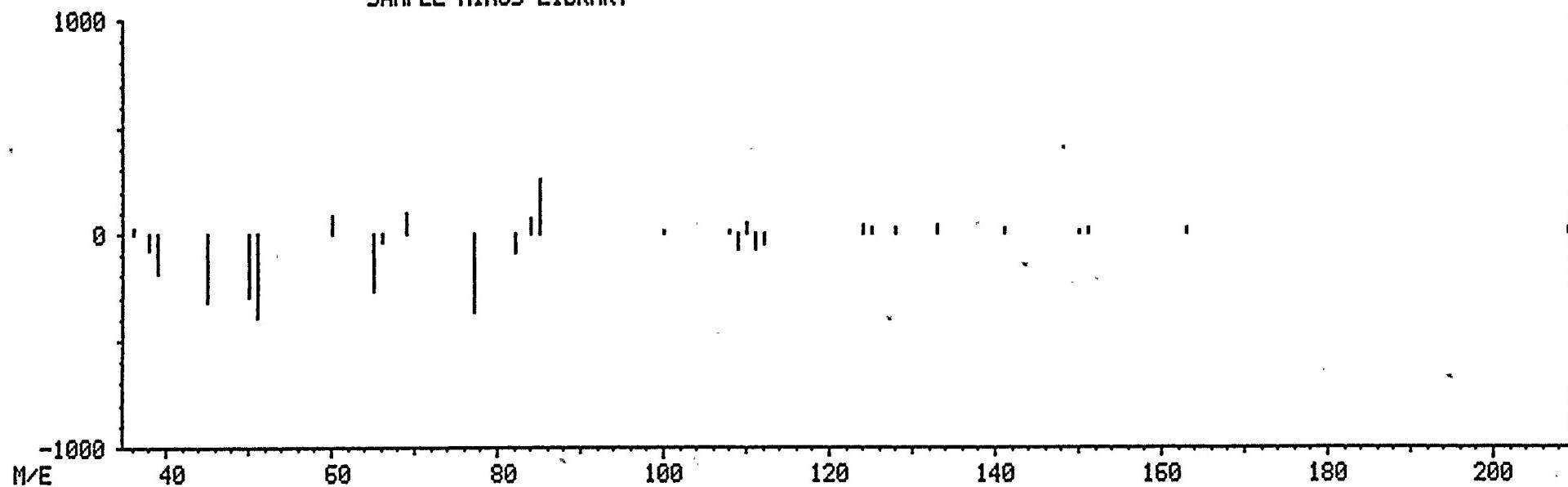
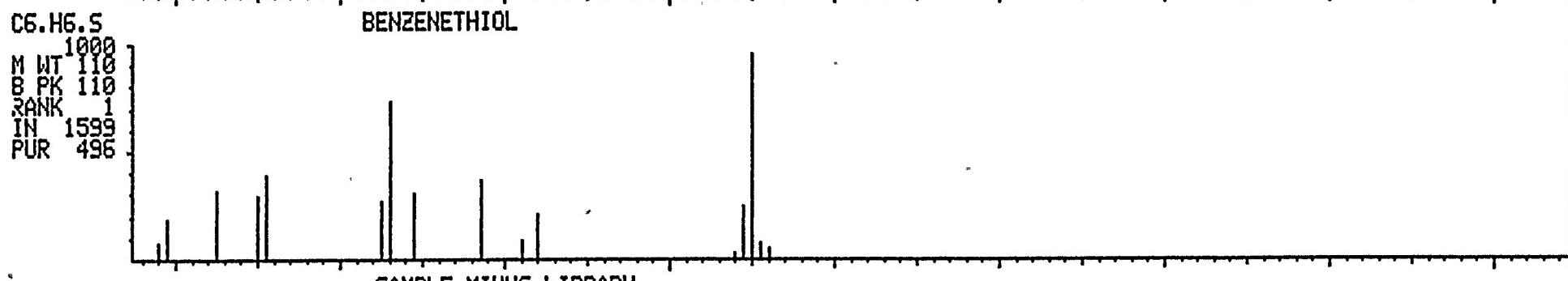
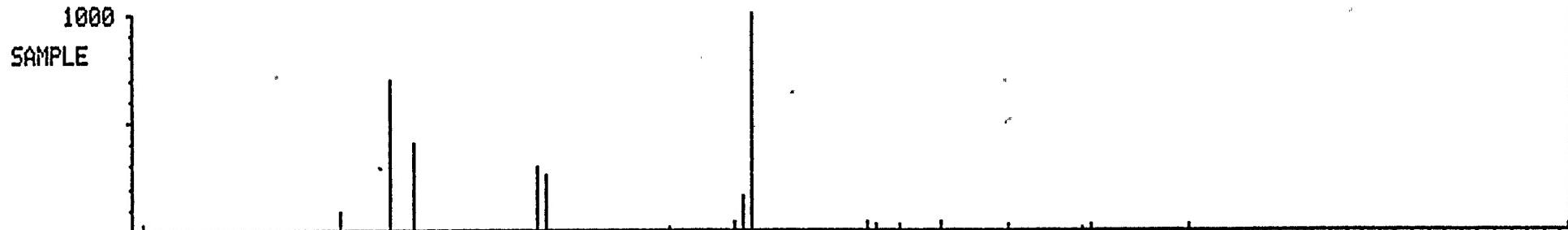
BASE M/E: 44
RIC: 587775.



LIBRARY SEARCH
05/14/81 10:06:00 + 4:45
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 285
CALI: CAL331 # 1

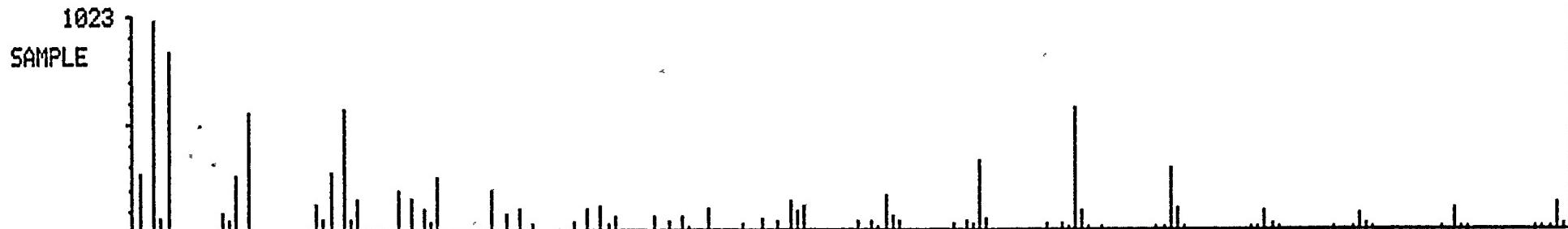
BASE M/E: 110
RIC: 911.



LIBRARY SEARCH
05/14/81 10:06:00 + 10:03
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 603
CALI: CAL331 # 1

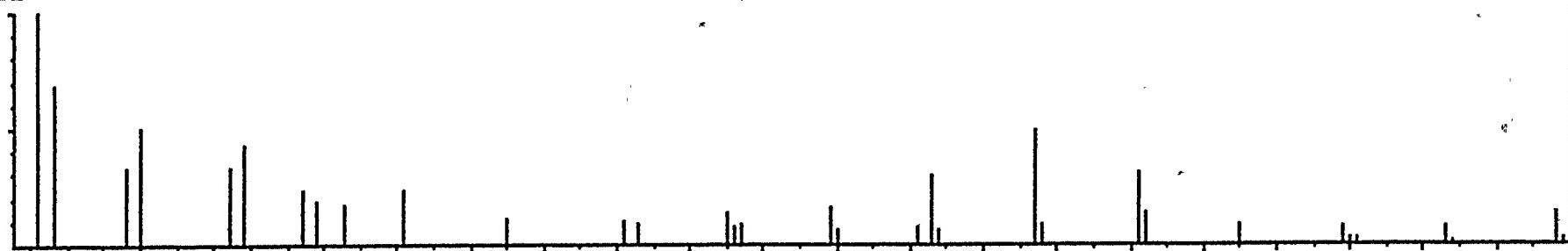
BASE M/E: 41
RIC: 163839.



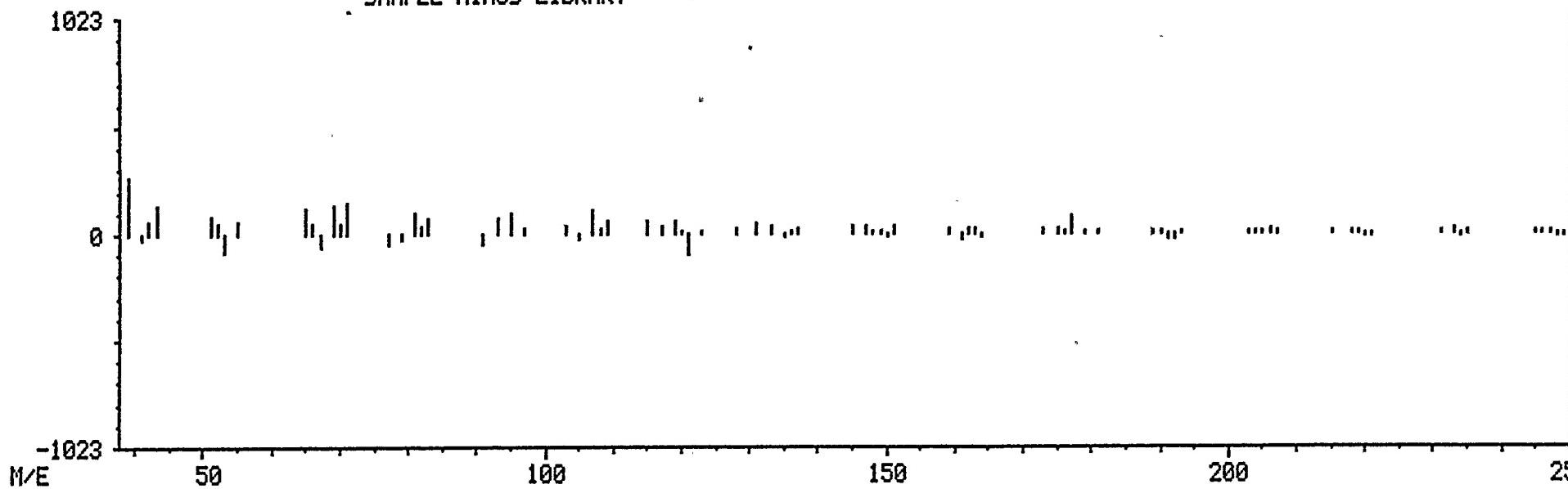
C16.H24.02

2,5-CYCLOHEXADIENE-1,4-DIONE,2,5-BIS(1,1-DIMETHYLPROPYL)-

1023
M WT 248
B PK 41
RANK 1
IN 17869
PUR 763



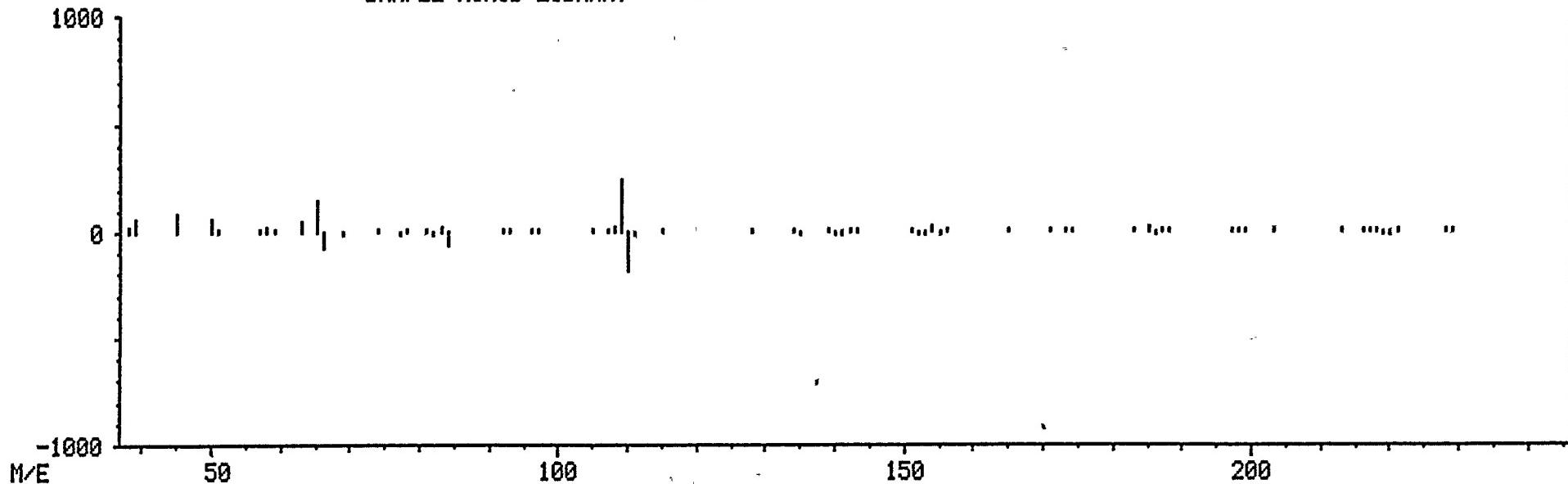
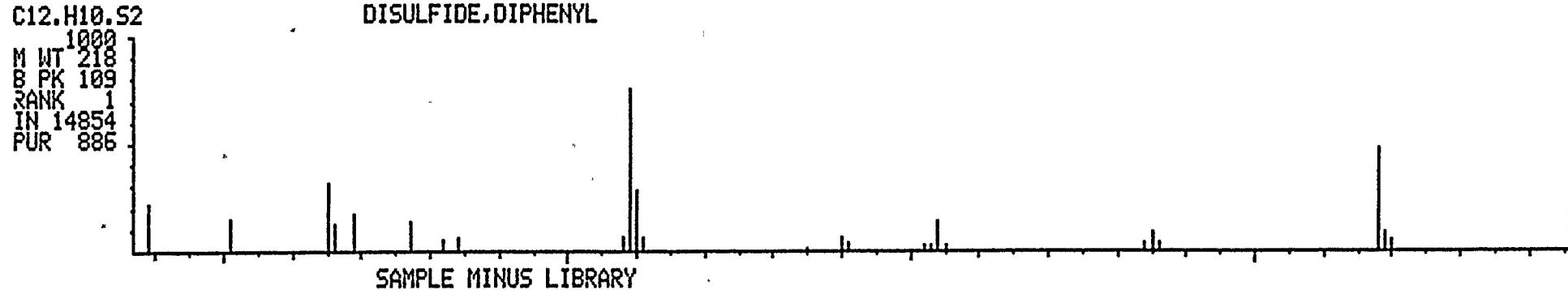
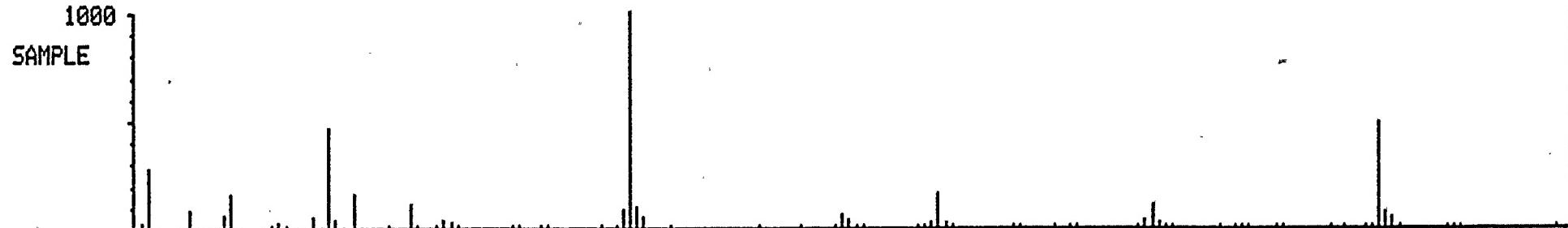
SAMPLE MINUS LIBRARY



LIBRARY SEARCH
05/14/81 10:06:00 + 11:21
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 681
CALI: CAL331 # 1

BASE M/E: 109
RIC: 216319.



RIC + MASS CHROMATOGRAMS

03/27/81 10:29:00

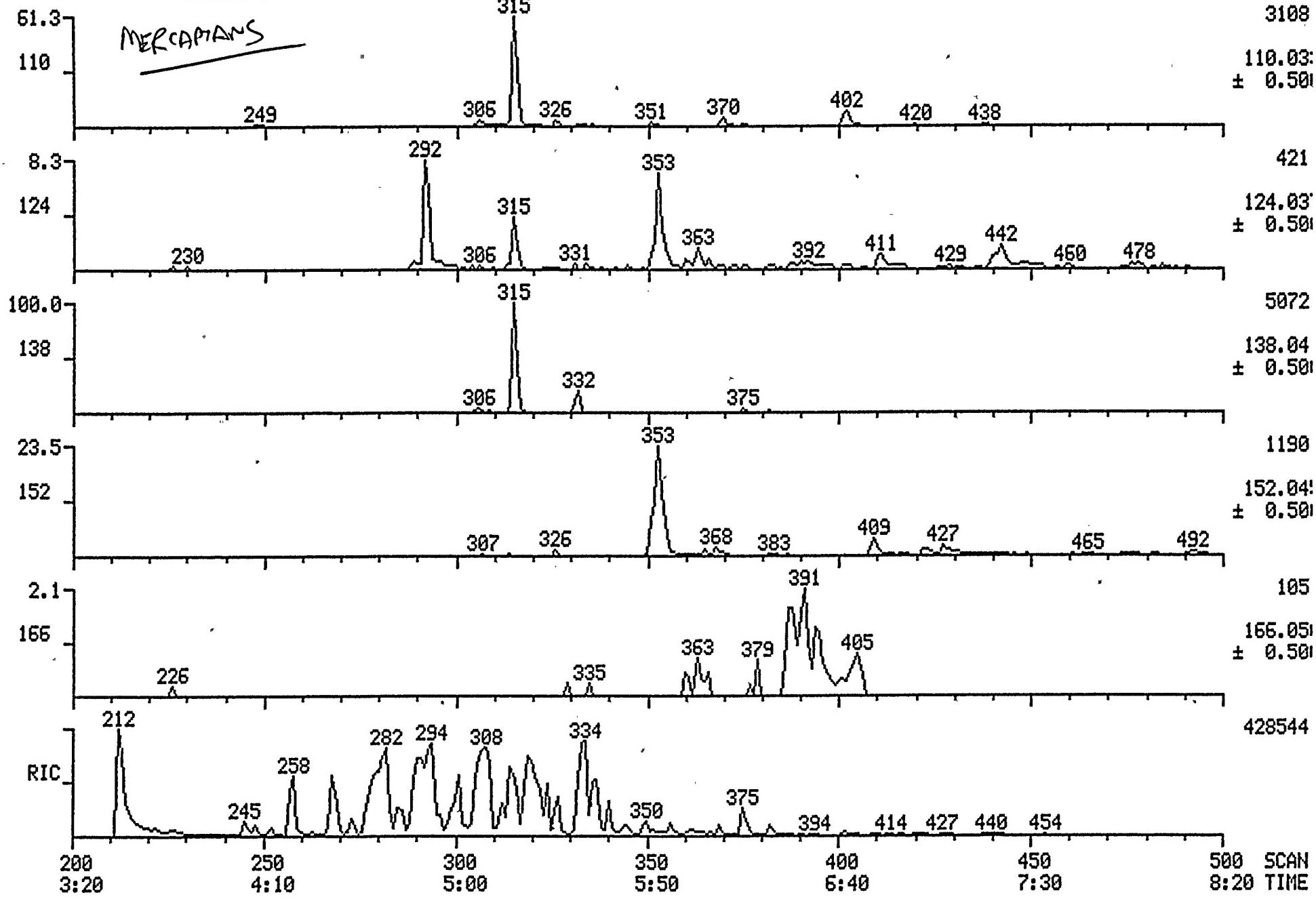
SAMPLE: Q2 +3%DIMETHYL ACETAMIDE

RANGE: G 1,1000 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: UVQ25R51A #315

CALI: CAL724 #4

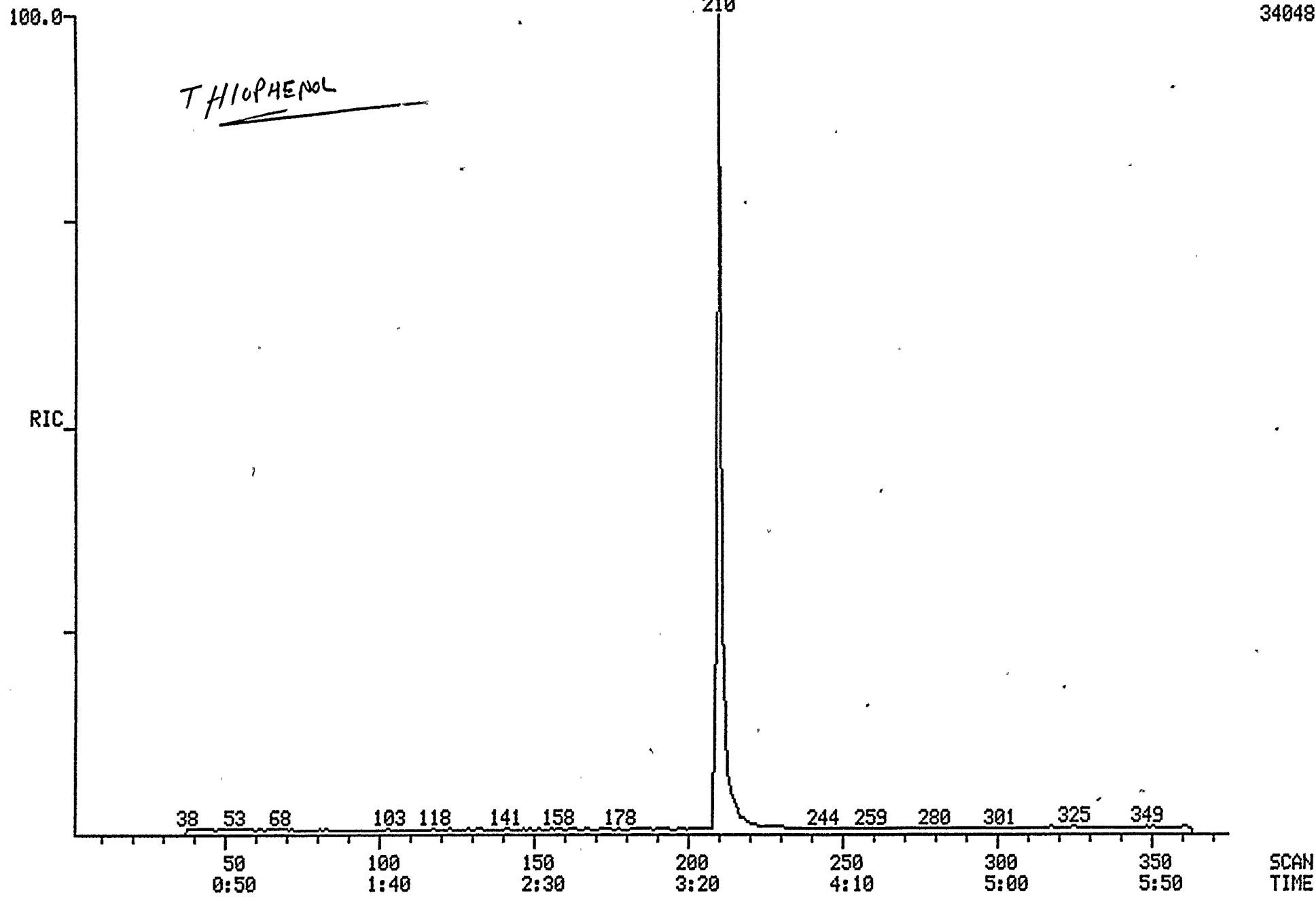
SCANS 200 TO 500



RIC
03/26/81 14:32:00
SAMPLE: THIOPHENOL
RANGE: G 1, 375 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: THIOPHENOL #210
CALI: CAL312 #3

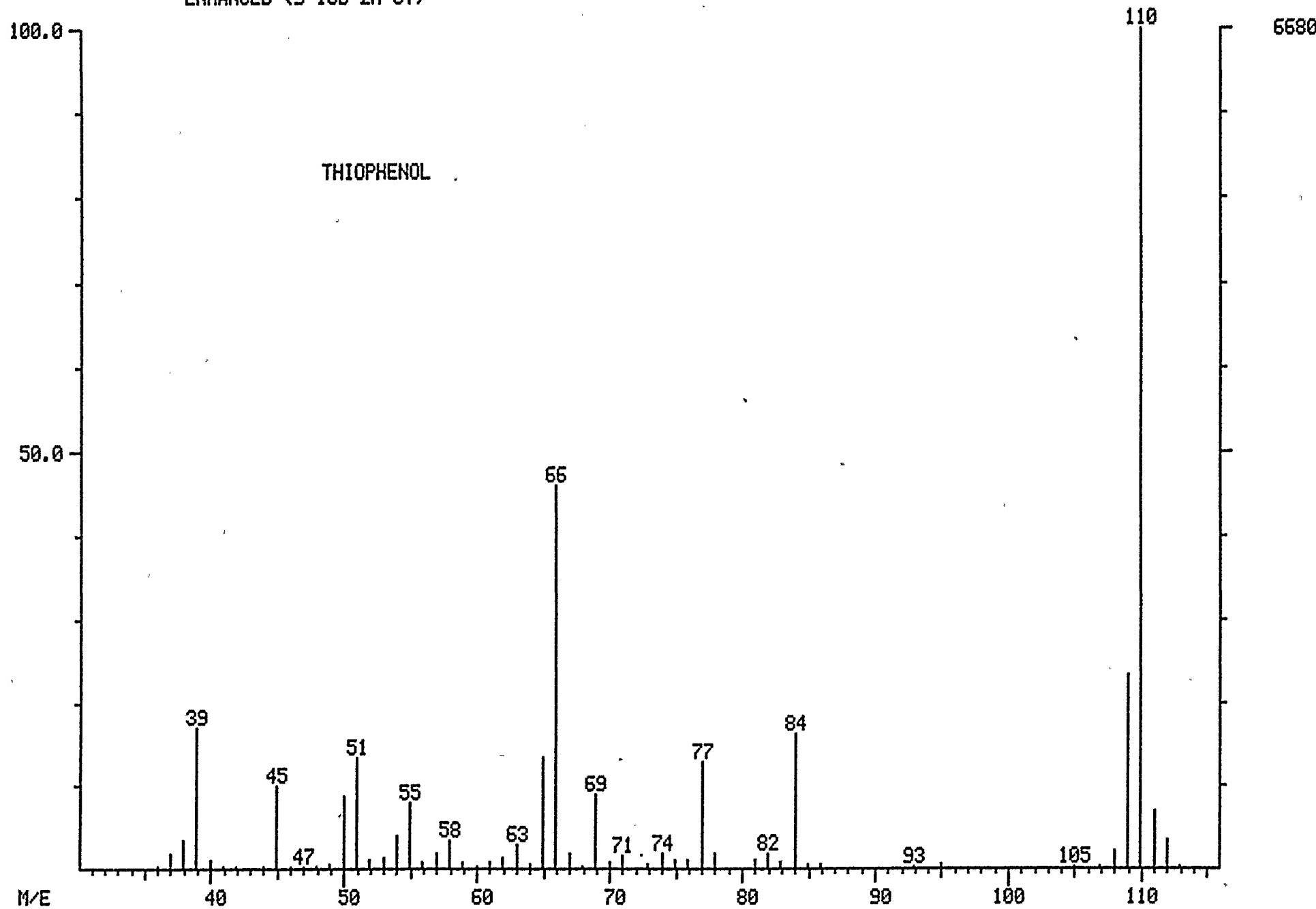
SCANS 1 TO 375



MASS SPECTRUM
03/26/81 14:32:00 + 3:30
SAMPLE: THIOPHENOL
ENHANCED (S 158 2N 0T)

DATA: THIOPHENOL #210
CALI: CAL312 #3

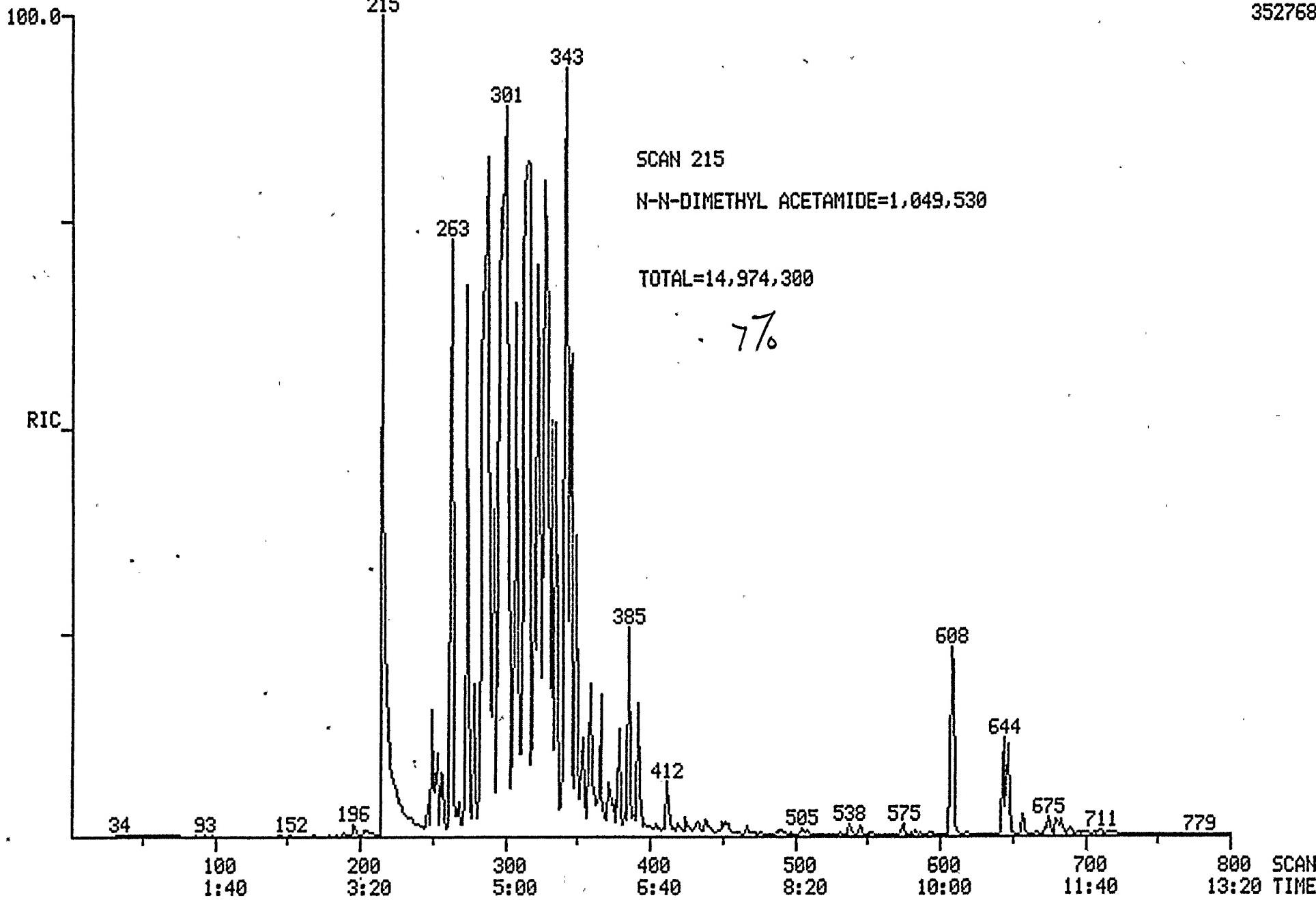
BASE M/E: 110
RIC: 22336.



RIC
03/25/81 10:41:00
SAMPLE: Q2 OV101 CAP 60-265
RANGE: G 1,1163 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL2 #1
CALI: CAL15 #2

SCANS 1 TO 800

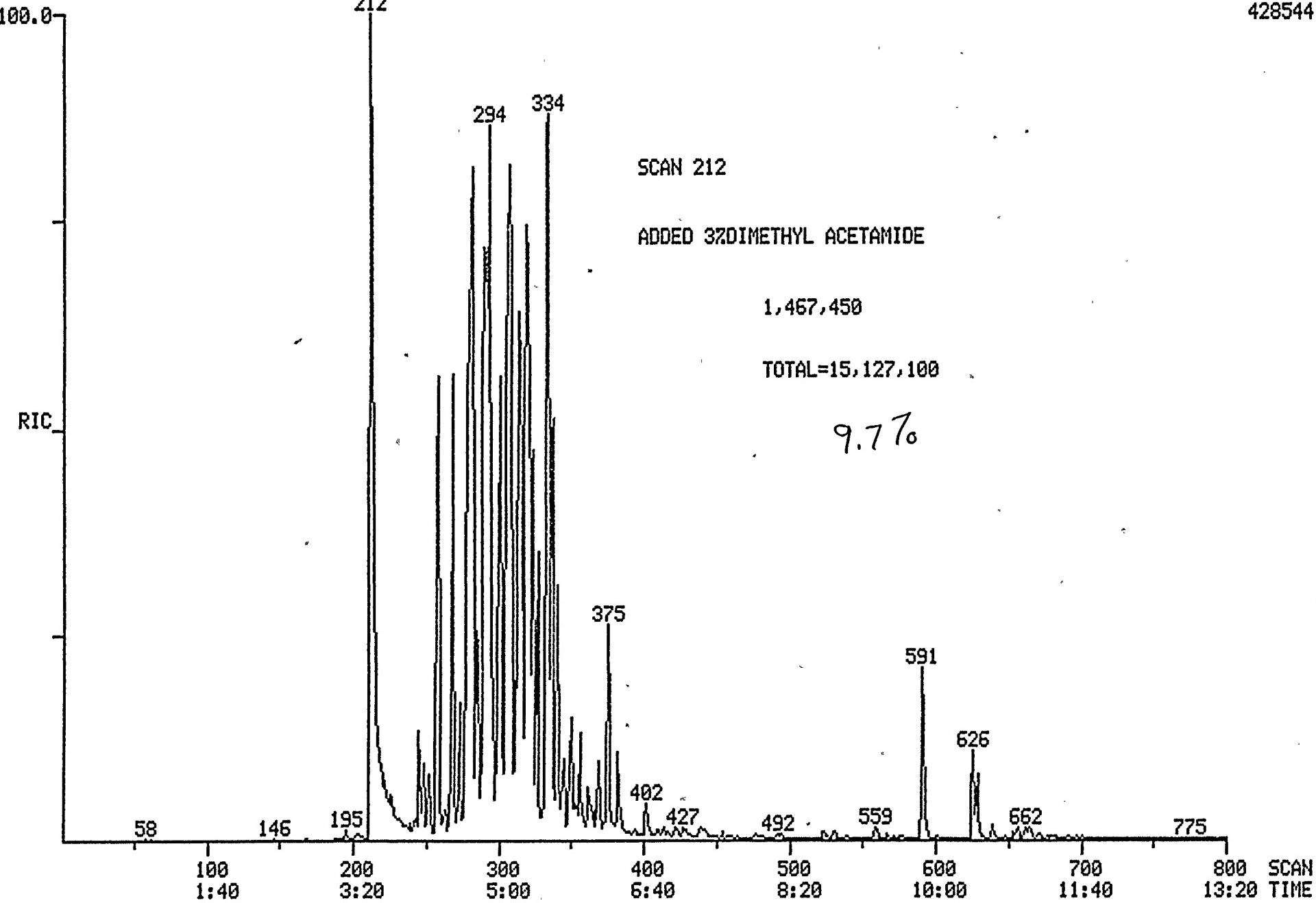


RIC
03/27/81 10:29:00
SAMPLE: Q2 +32DIMETHYL ACETAMIDE
RANGE: G 1, 948 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: VYQ2SR51A #1
CALI: CAL15 #2

SCANS 1 TO 800

428544



RIC + MASS CHROMATOGRAM

03/25/81 10:41:00

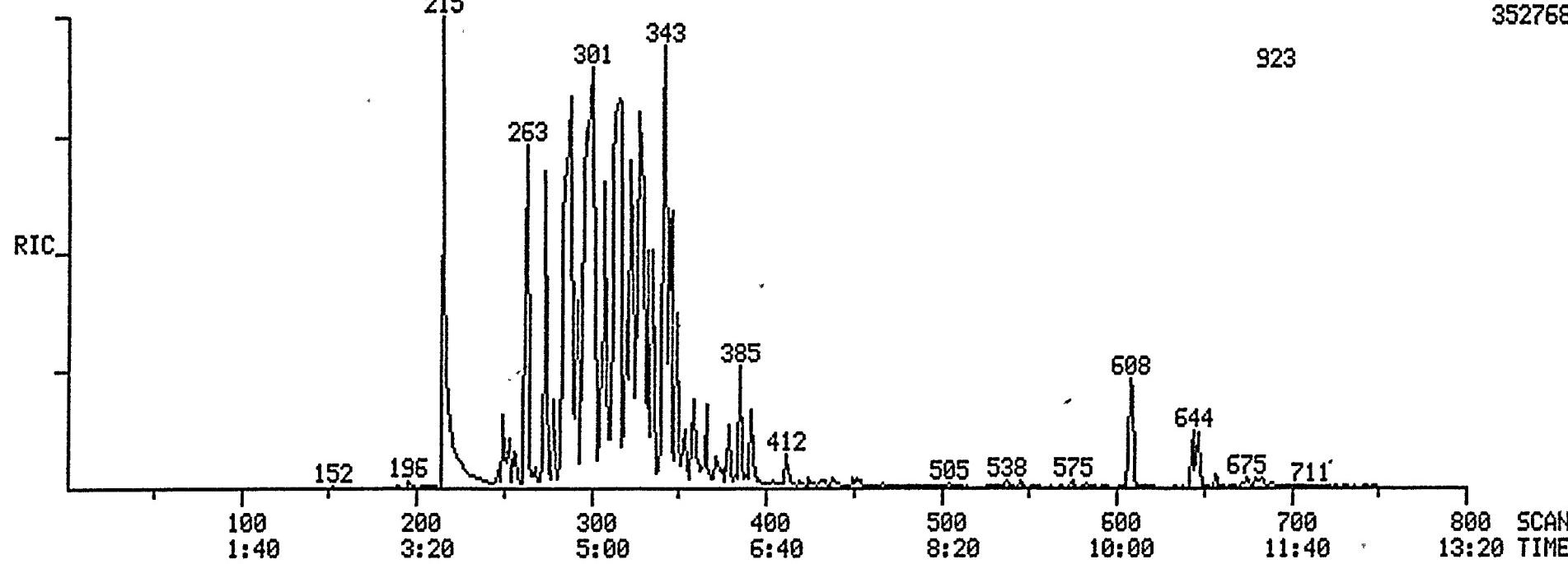
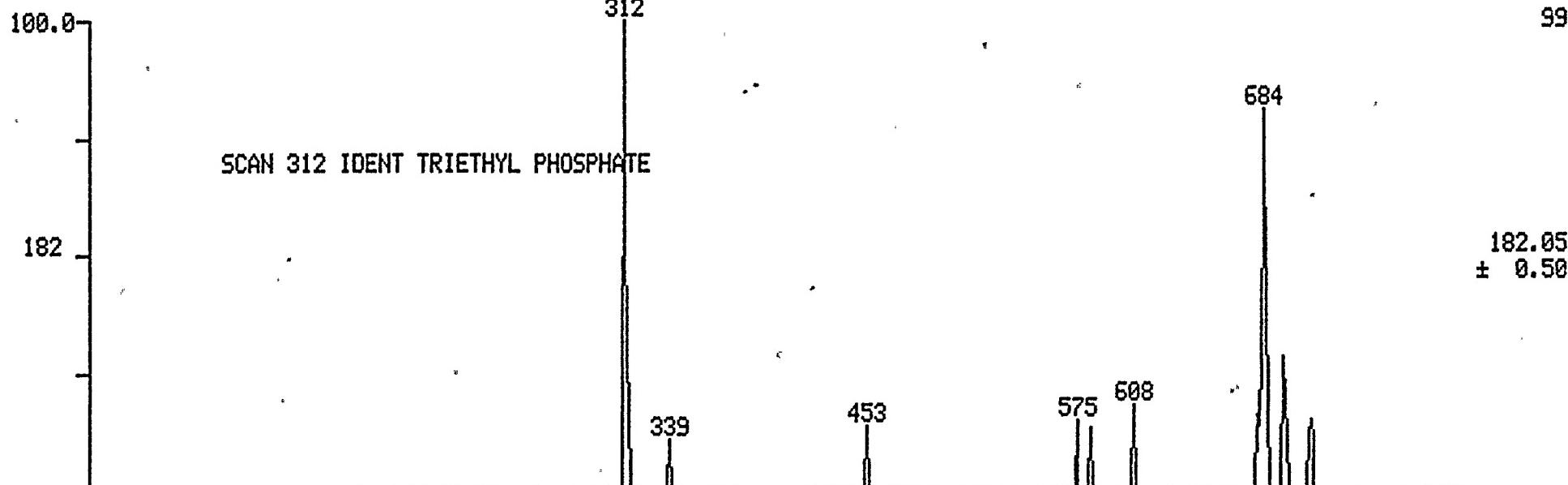
SAMPLE: Q2 OV101 CAP 60-265

RANGE: G 1,1163 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL2 #312

CALI: CAL15 #2

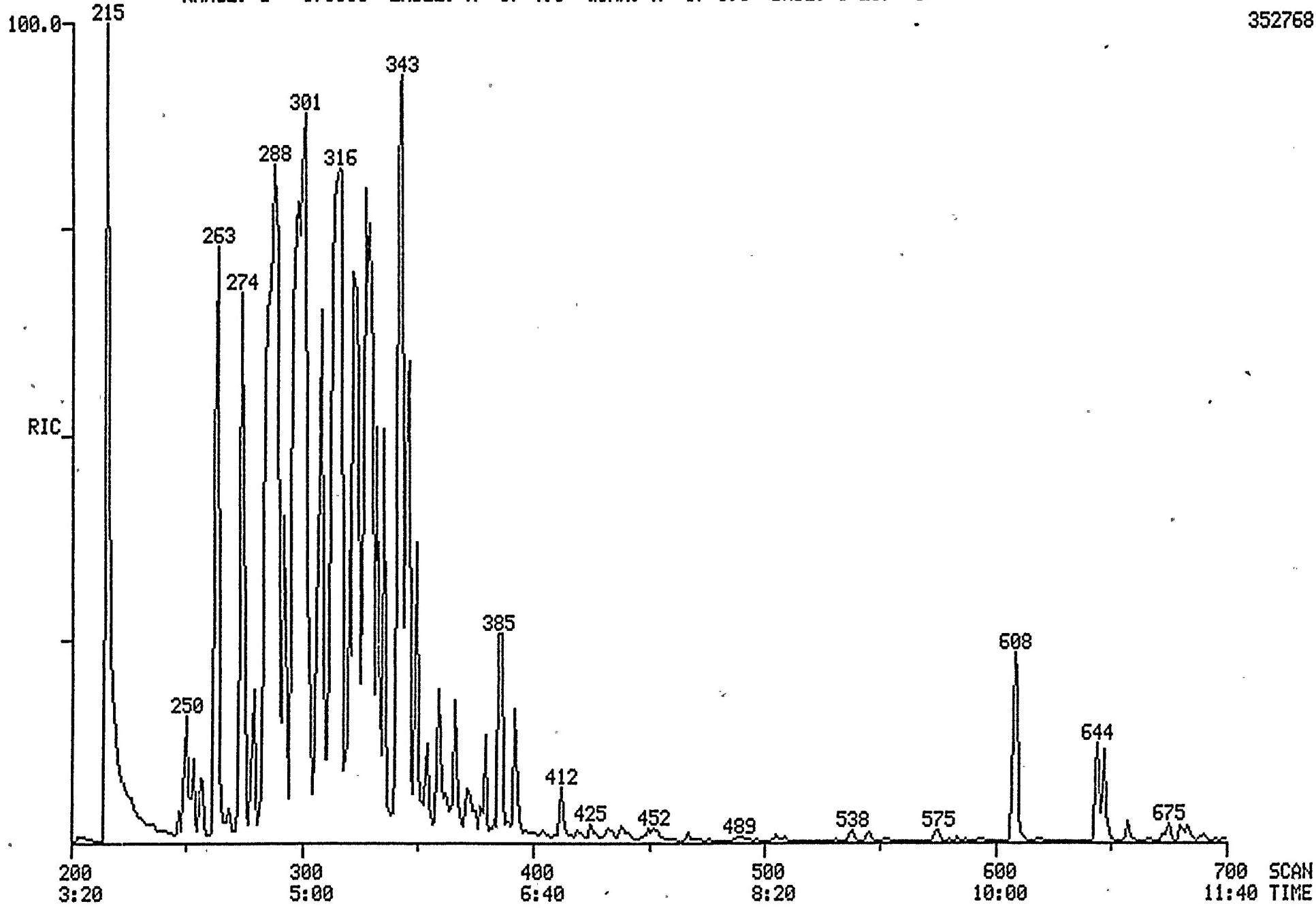
SCANS 1 TO 800



RIC
03/25/81 10:41:00
SAMPLE: Q2 OV101 CAP 60-265
RANGE: G 1,1163 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL2 #1
CALI: CAL15 #2

SCANS 200 TO 700



RIC + MASS CHROMATOGRAMS

03/25/81 10:41:00

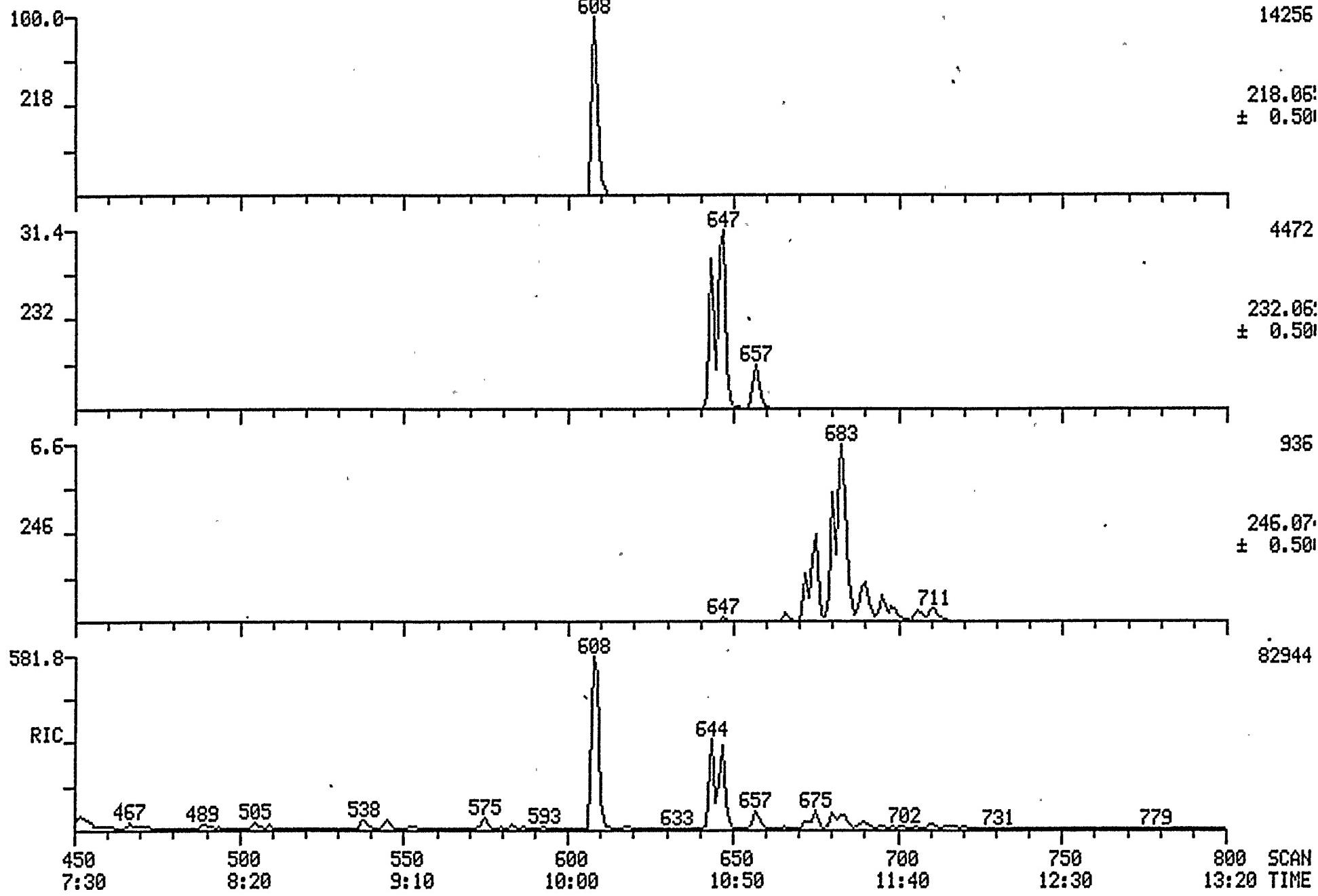
SAMPLE: Q2 OV101 CAP 60-265

RANGE: G 1,1163 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL2 #1

CALI: CAL15 #2

SCANS 450 TO 800



RIC + MASS CHROMATOGRAMS

03/25/81 10:41:00

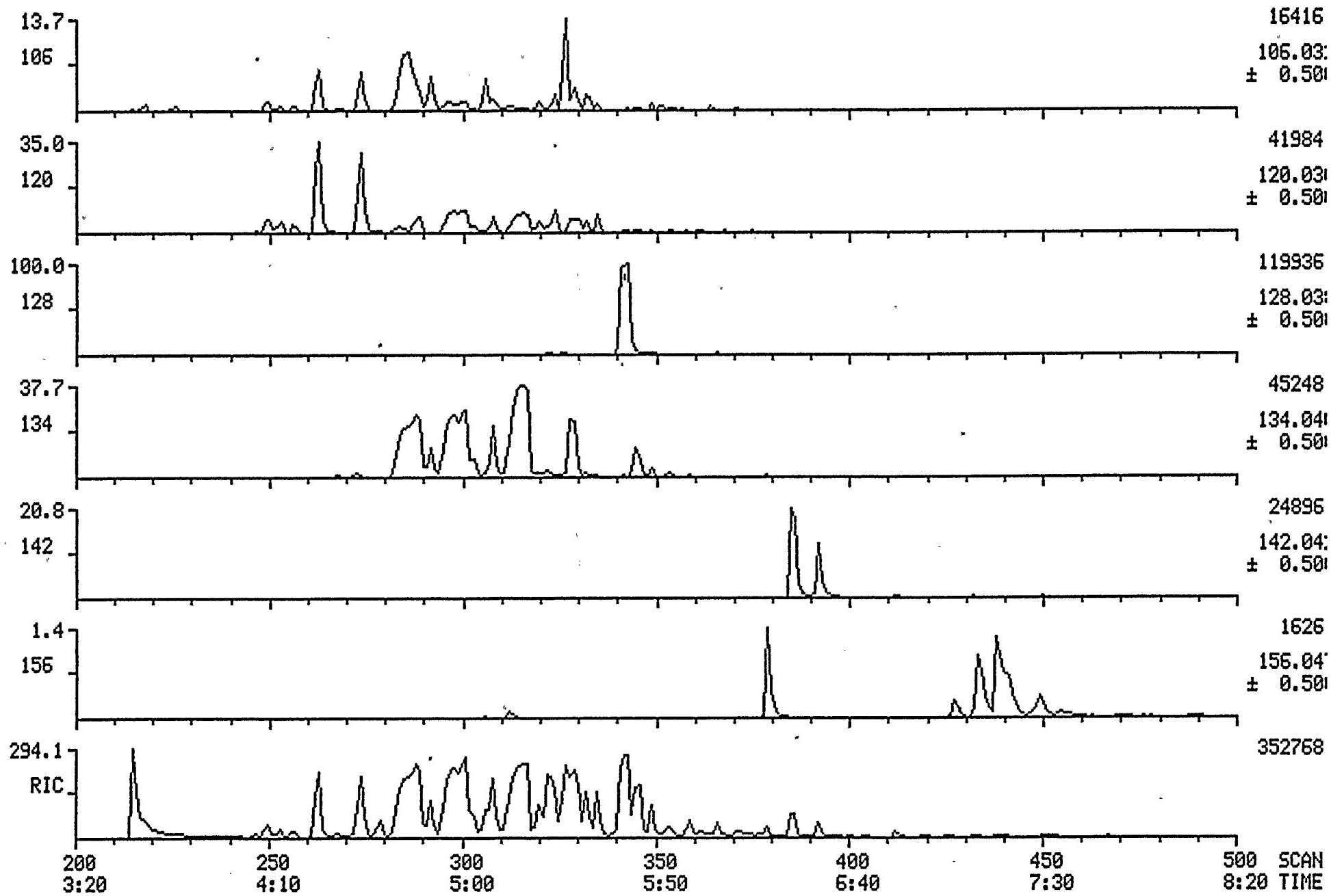
SAMPLE: Q2 OV101 CAP 60-265

RANGE: G 1,1163 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL2 #1

CALI: CAL15 #2

SCANS 200 TO 500



RIC + MASS CHROMATOGRAMS

03/25/81 10:41:00

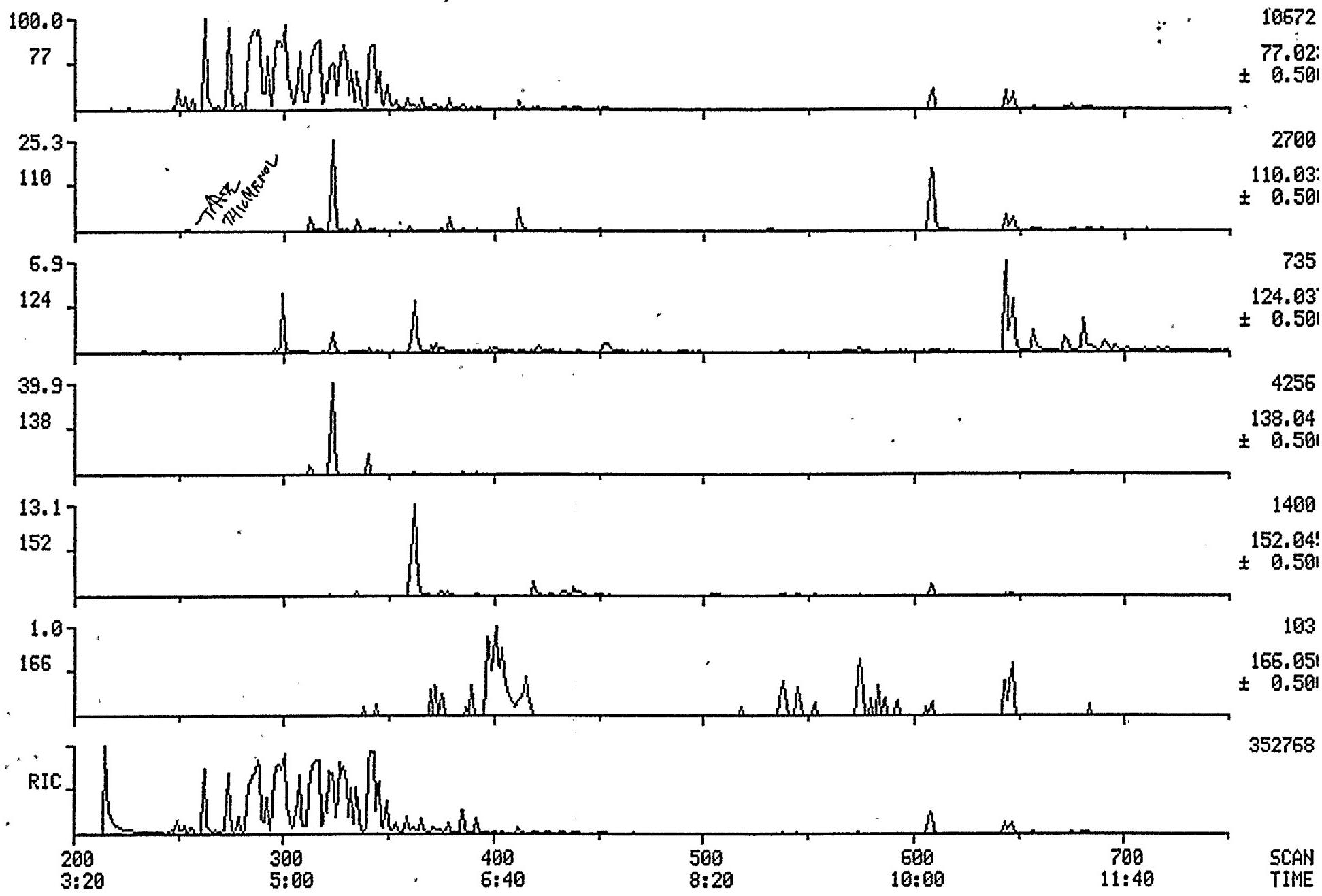
SAMPLE: Q2 0V101 CAP 60-265

RANGE: G 1,1163 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL2 #1

CALI: CAL15 #2

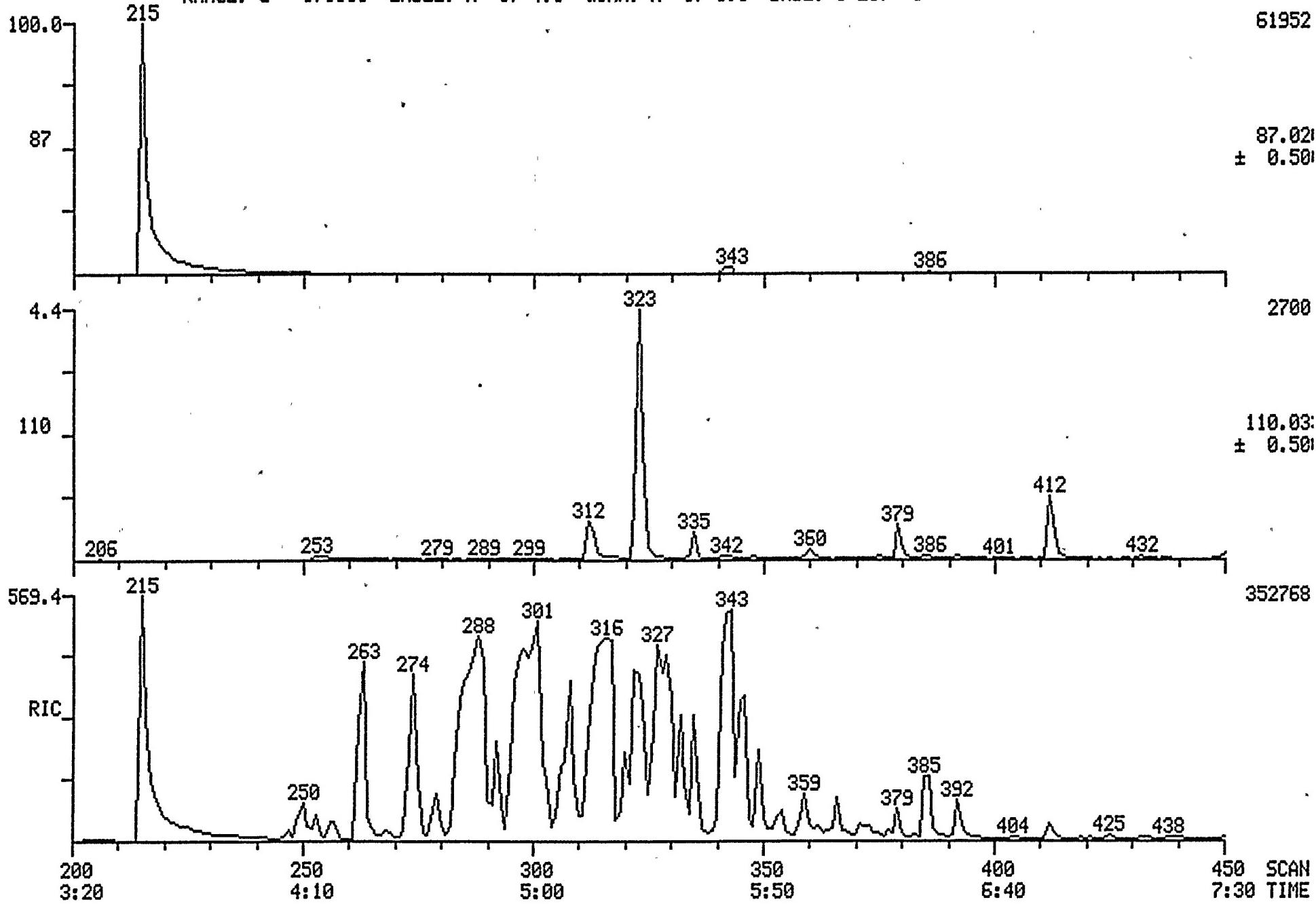
SCANS 200 TO 750



RIC + MASS CHROMATOGRAMS
03/25/81 10:41:00
SAMPLE: Q2 OV101 CAP 60-265
RANGE: G 1,1163 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL2 #1
CALI: CAL15 #2

SCANS 200 TO 450

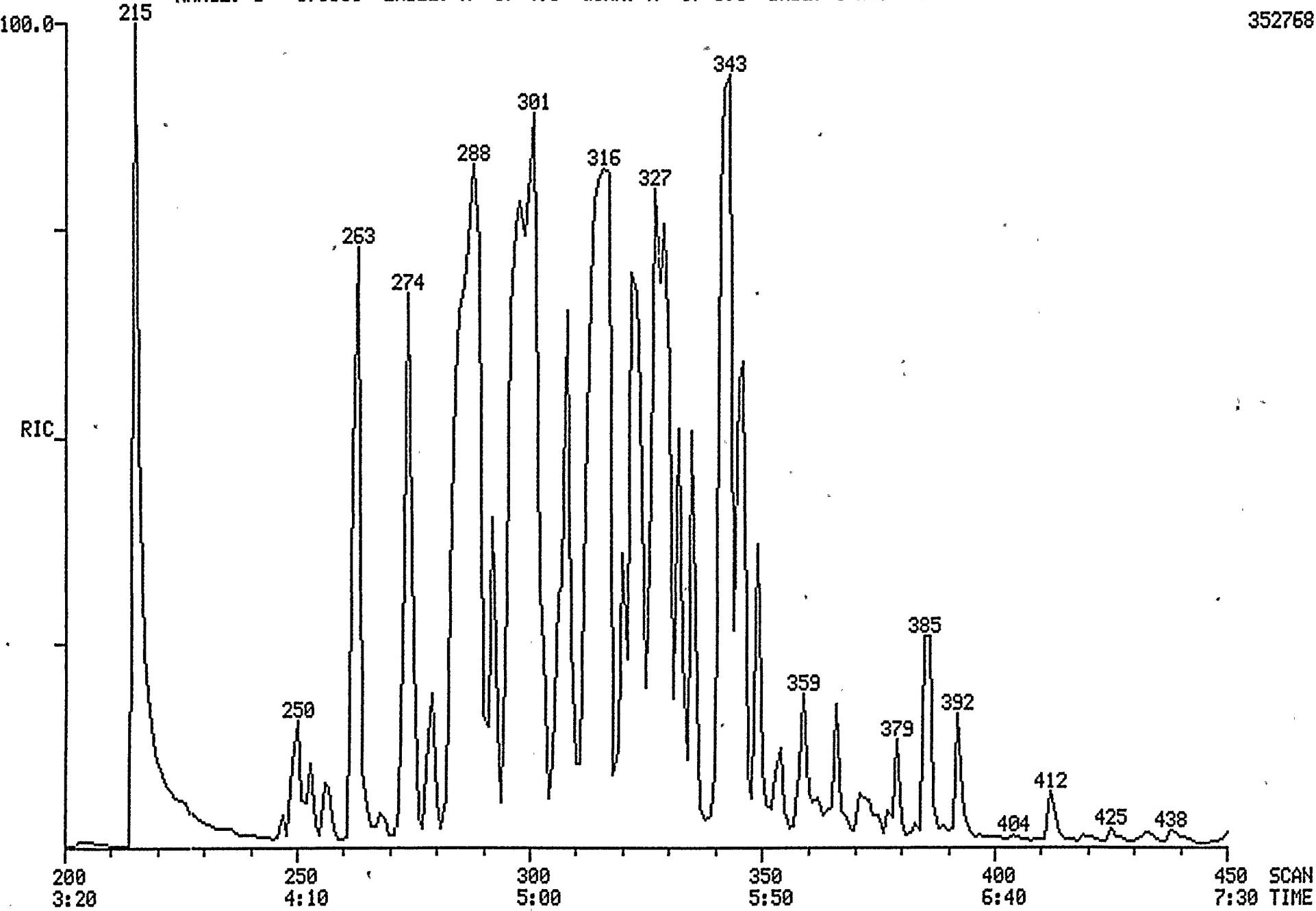


RIC
03/25/81 10:41:00
SAMPLE: Q2 OV101 CAP 60-265
RANGE: G 1,1163 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: KEL2 #1
CALI: CAL15 #2

SCANS 200 TO 450

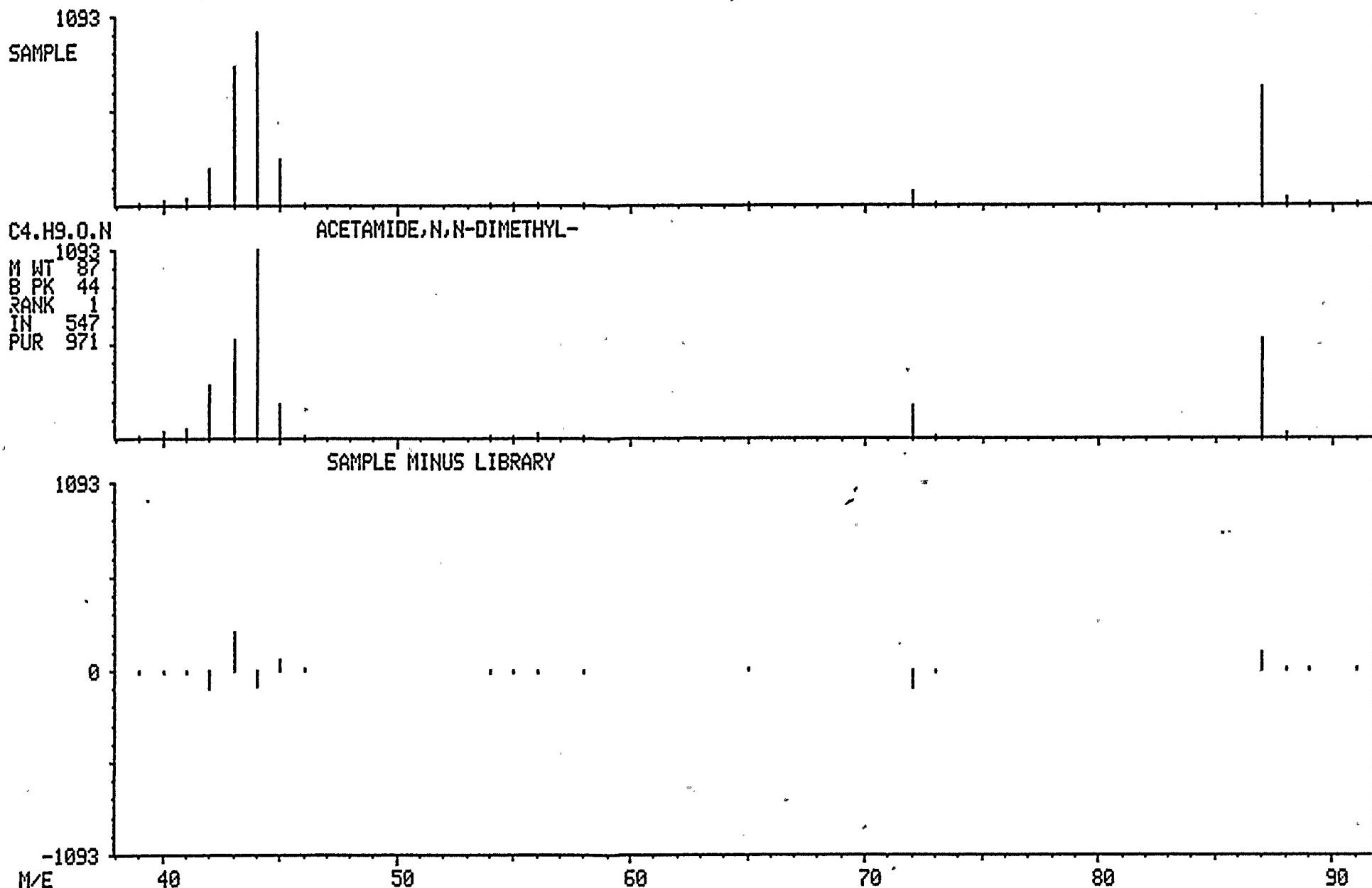
352768



LIBRARY SEARCH
03/25/81 10:41:00 + 3:35
SAMPLE: Q2 OV101 CAP 60-265
ENHANCED (S 158 2N 0T)

DATA: KEL2 # 215
CALI: CAL15 # 2

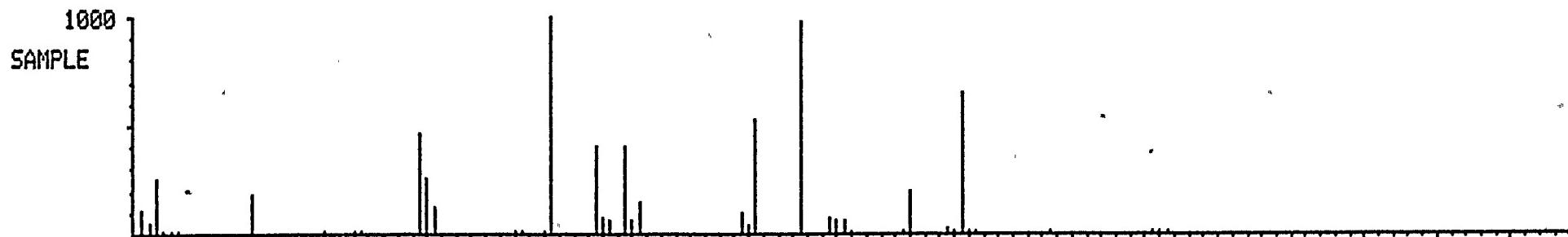
BASE M/E: 44
RIC: 170239.



LIBRARY SEARCH
03/25/81 10:41:00 + 5:12
SAMPLE: Q2 OV101 CAP 60-265
ENHANCED (S 15B 2N 0T)

DATA: KEL2 # 312
CALI: CAL15 # 2

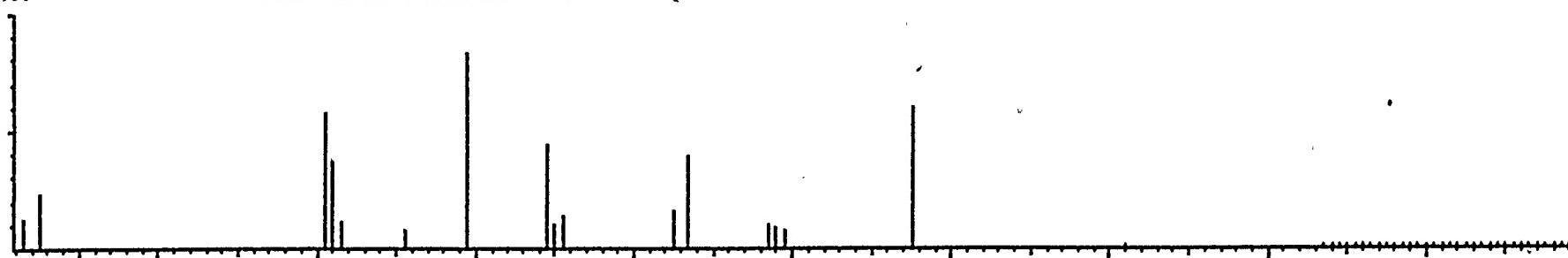
BASE M/E: 99
RIC: 28799.



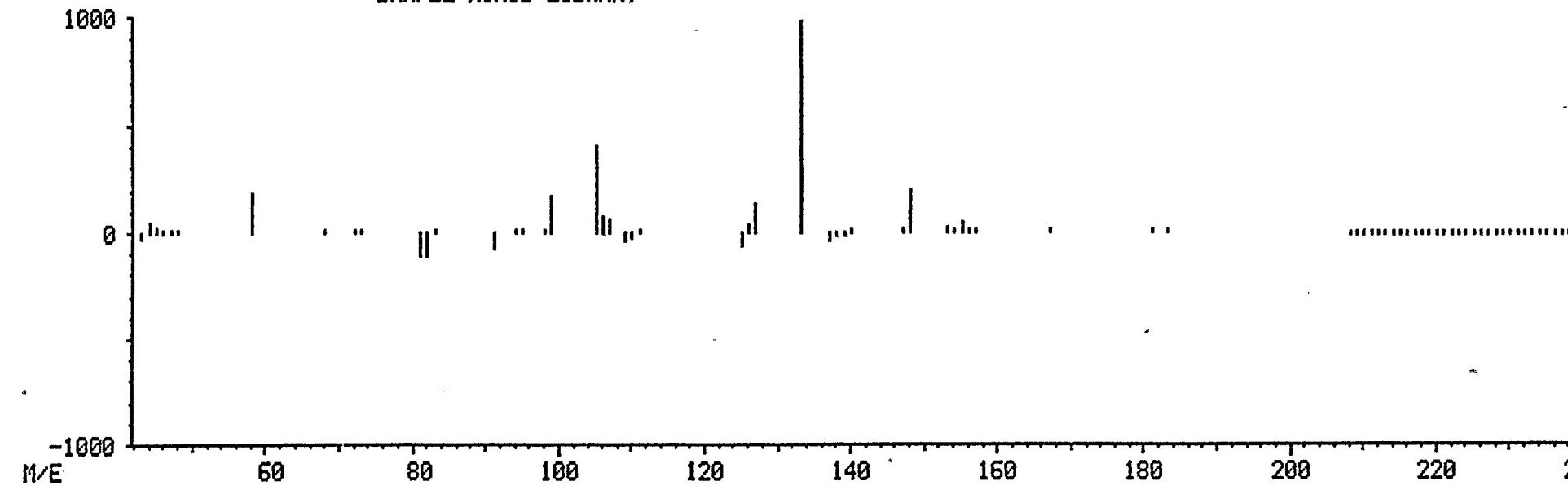
C6.H15.04.P

PHOSPHORICACID, TRIETHYLESTER

1000
 M WT 182
 B PK 99
 RANK 1
 IN 10532
 PUR 621



SAMPLE MINUS LIBRARY



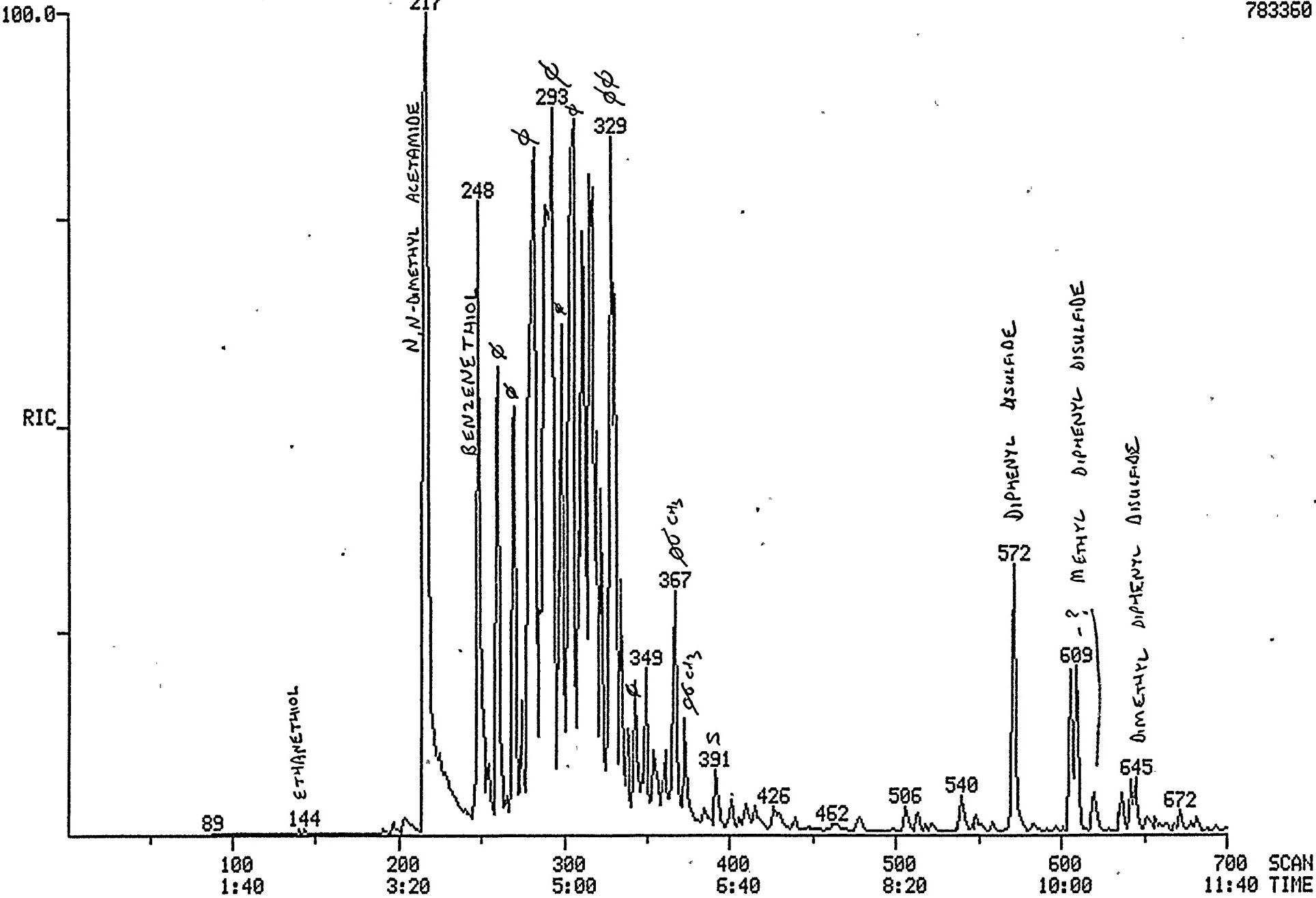
Q1 SR51

RIC
04/22/81 8:54:00
SAMPLE: Q1 SR51
RANGE: G 1, 761 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: UVQ1SR51 #1
CALI: CAL331 #1

SCANS 1 TO 700

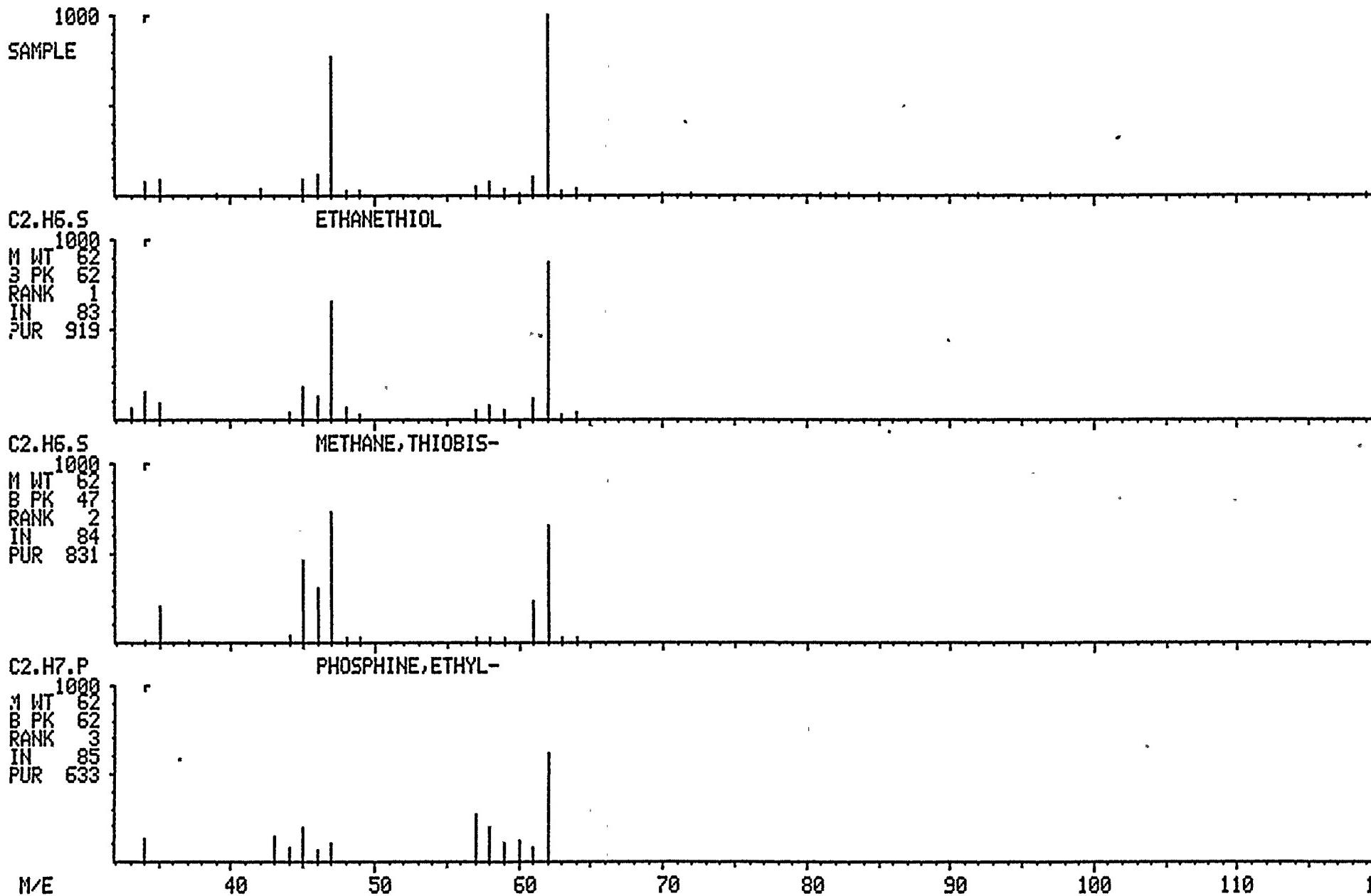
783360



LIBRARY SEARCH
04/22/81 8:54:00 + 2:24
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ15R51 # 144
CALI: CAL331 # 1

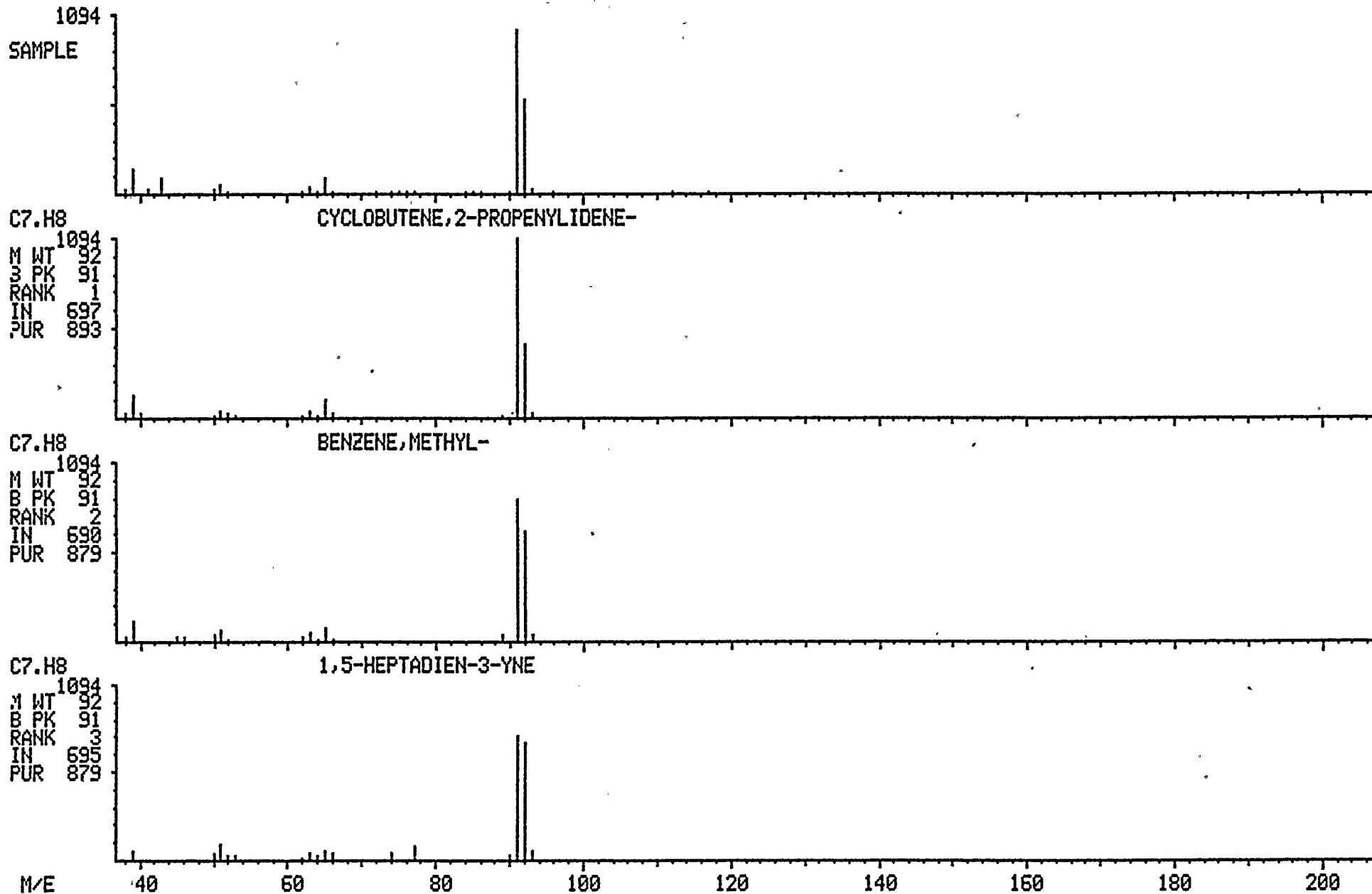
BASE M/E: 62
RIC: 3251.



LIBRARY SEARCH
04/22/81 8:54:00 + 3:11
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ1SR51 # 191
CALI: CAL331 # 1

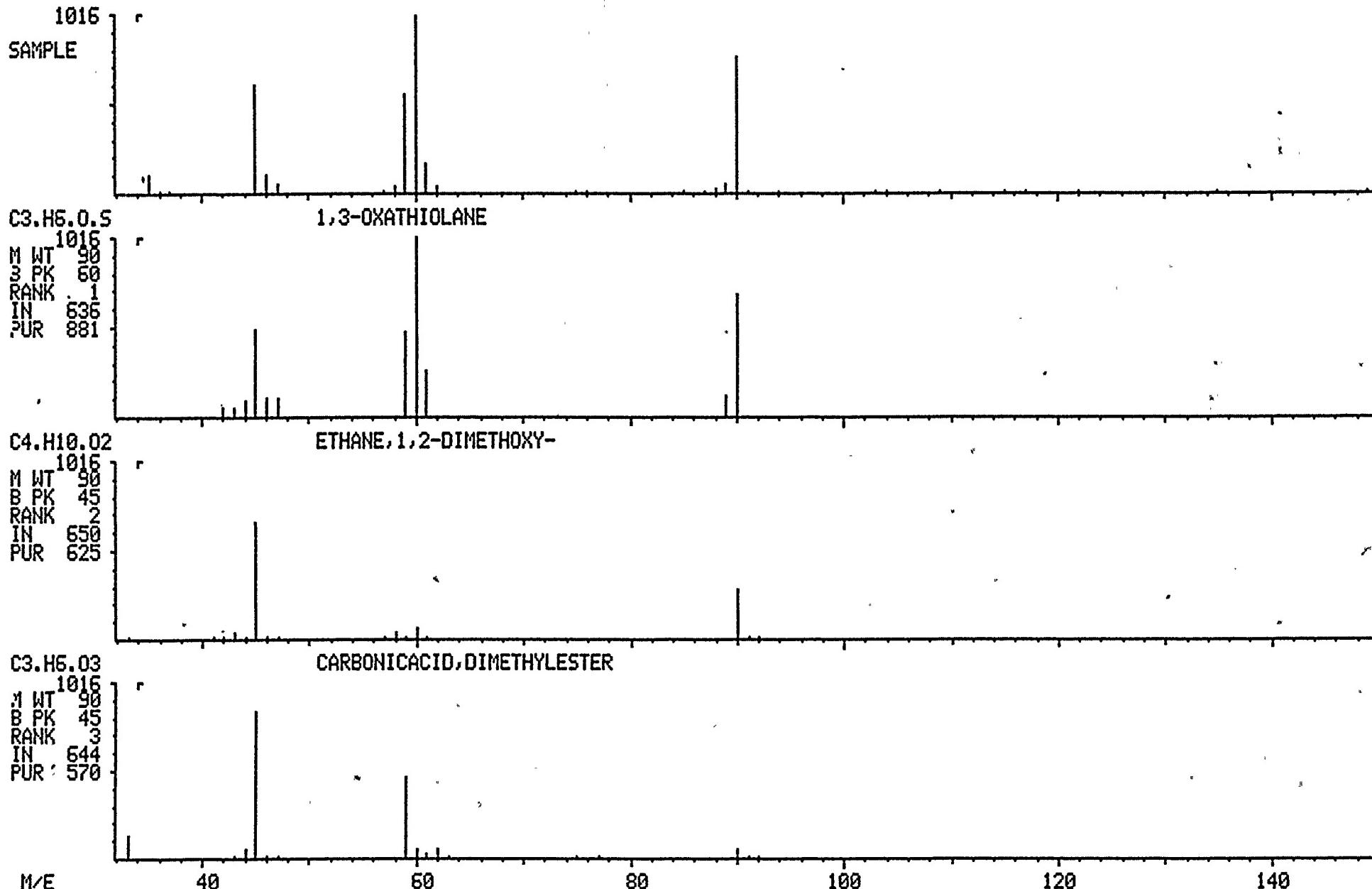
BASE M/E: 91
RIC: 3139.



LIBRARY SEARCH
04/22/81 8:54:00 + 3:17
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ15R51 # 197
CALI: CAL331 # 1

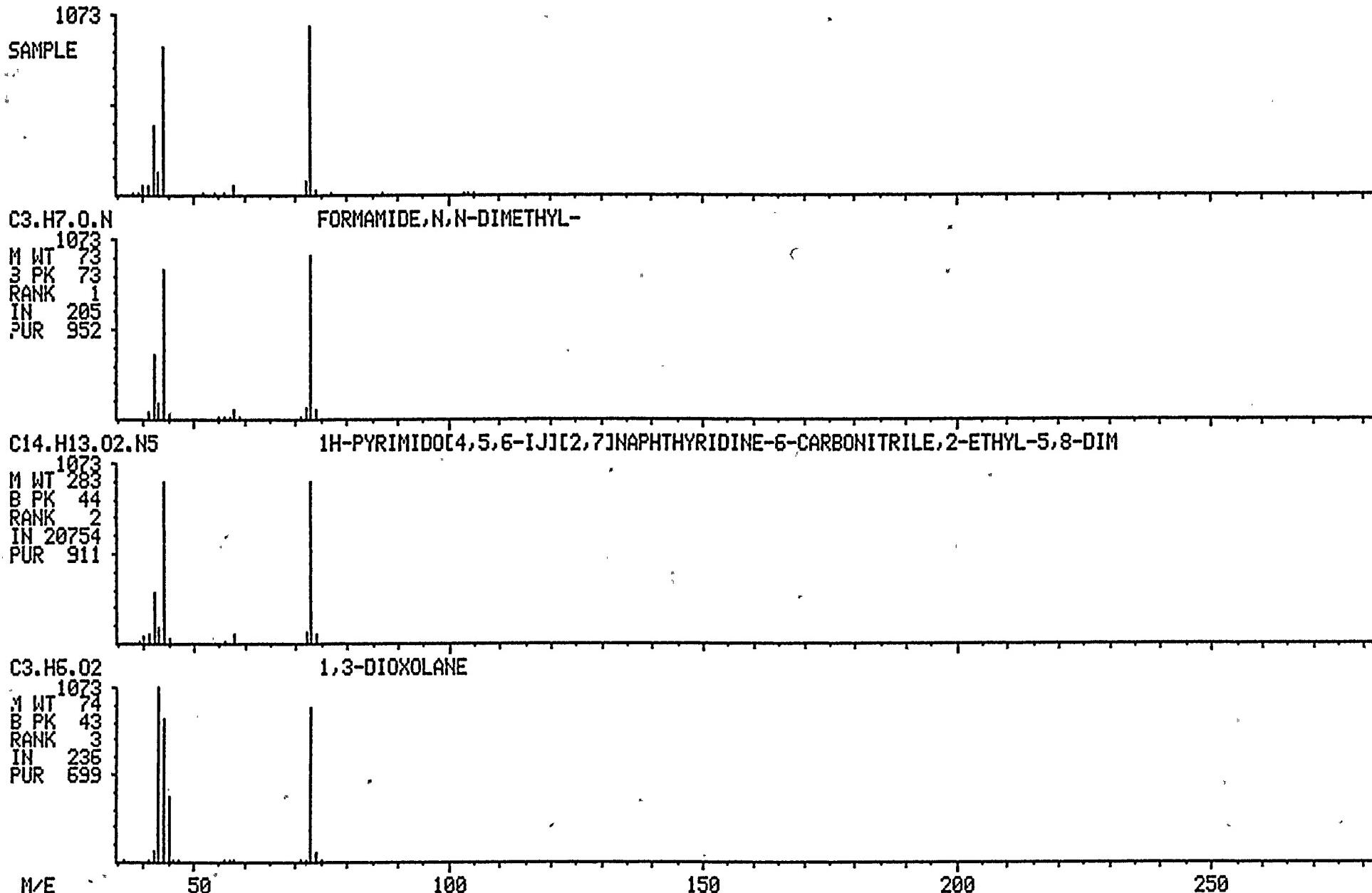
BASE M/E: 60
RIC: 8055.



LIBRARY SEARCH
04/22/81 8:54:00 + 3:24
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ1SR51 # 204
CALI: CAL331 # 1

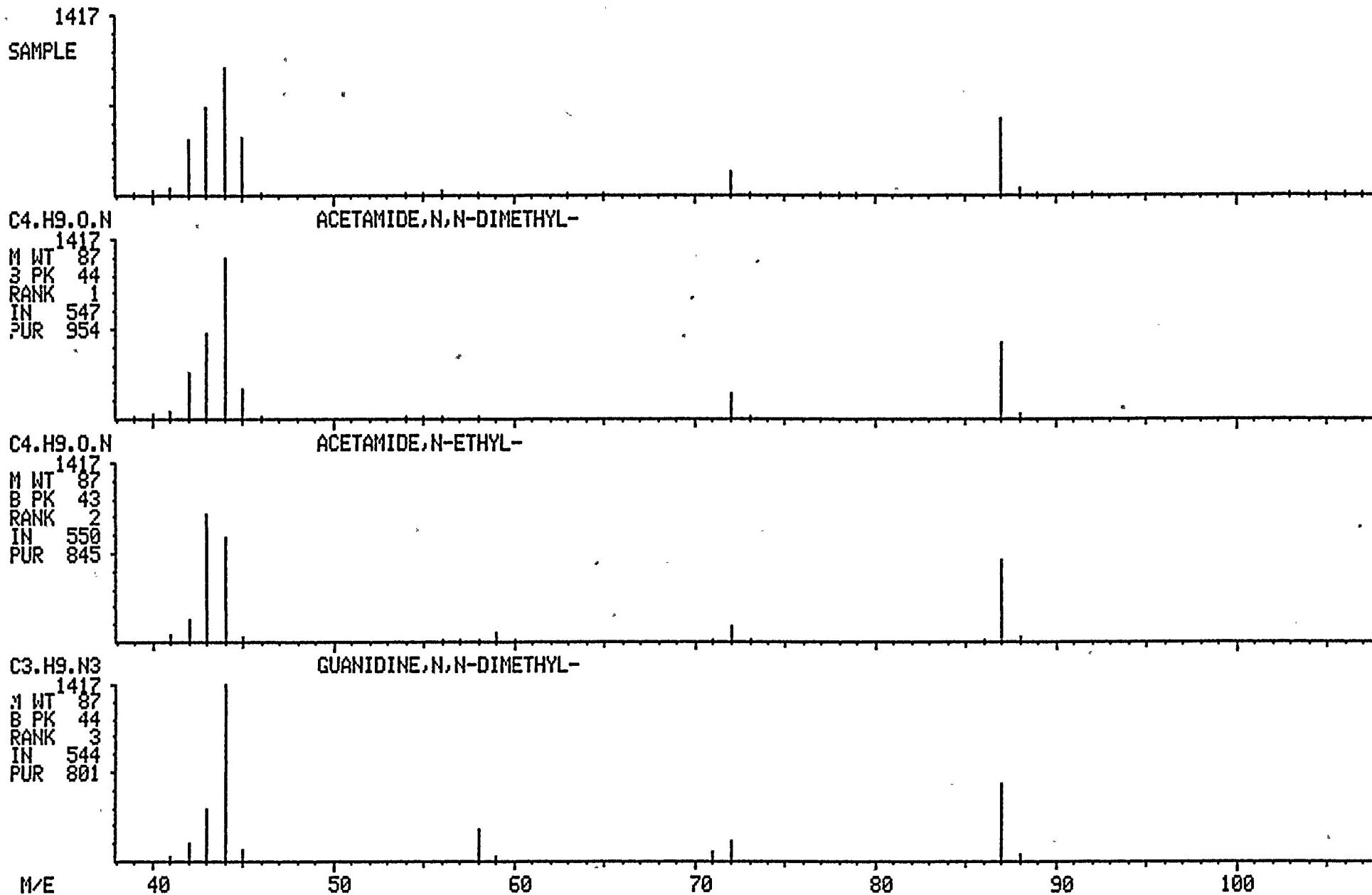
BASE M/E: 73
RIC: 11183.



LIBRARY SEARCH
04/22/81 8:54:00 + 3:37
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: VYQ15R51 # 217
CALI: CAL331 # 1

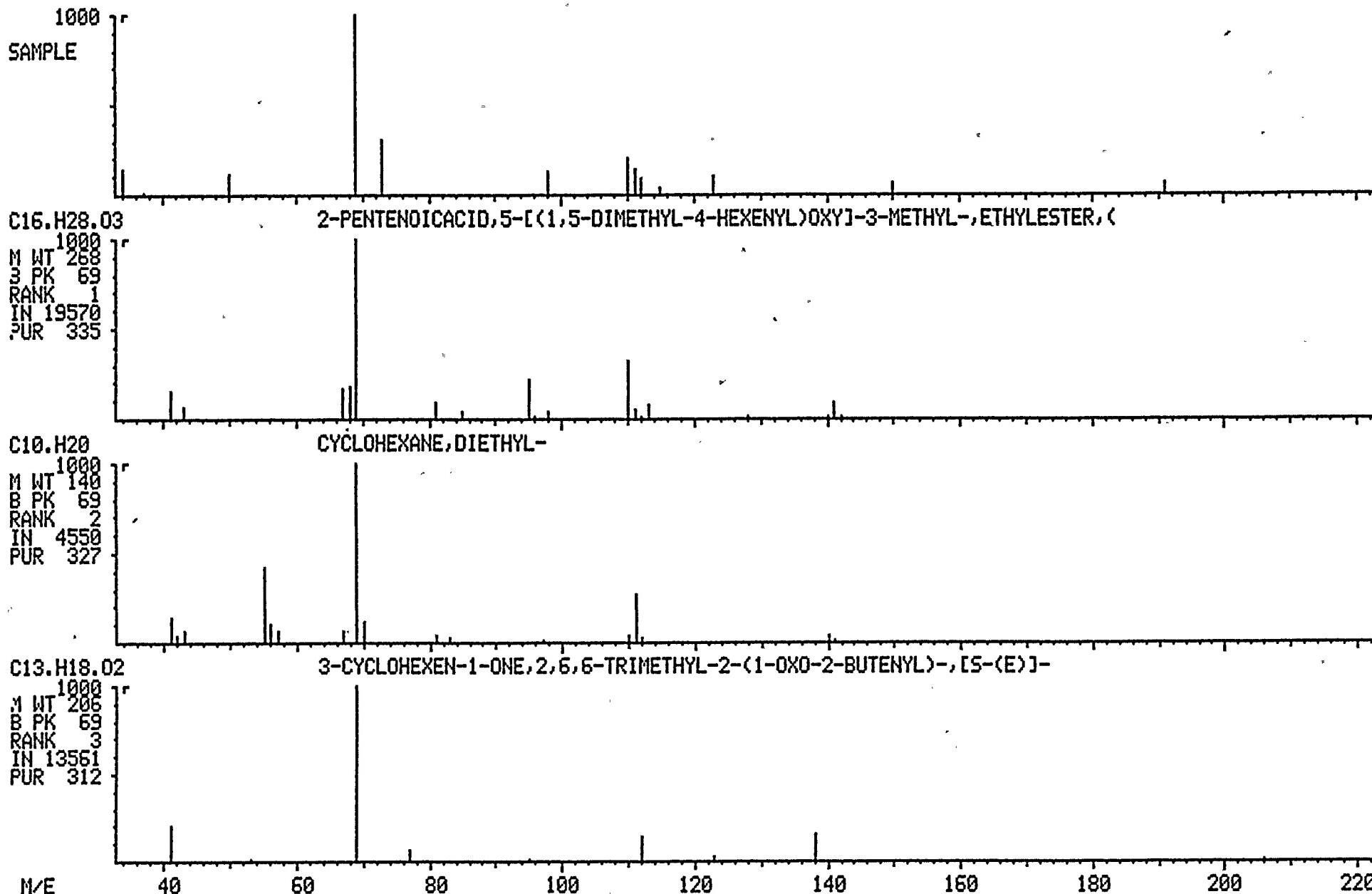
BASE M/E: 44
RIC: 532479.



LIBRARY SEARCH
04/22/81 8:54:00 + 4:03
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UVQ1SR51 # 243
CALI: CAL331 # 1

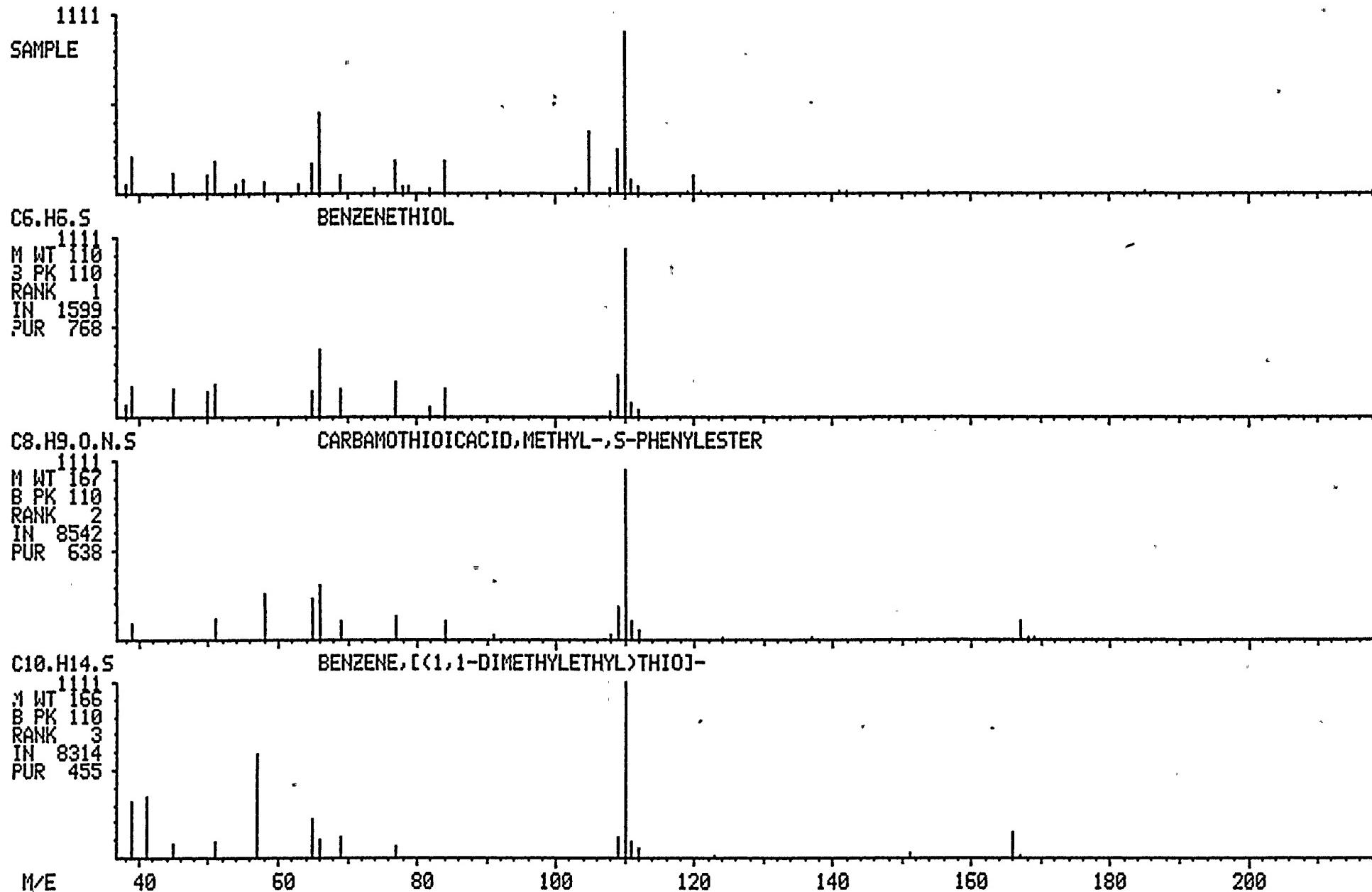
BASE M/E: 69
RIC: 165.



LIBRARY SEARCH
04/22/81 8:54:00 + 4:08
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 248
CALI: CAL331 # 1

BASE M/E: 110
RIC: 312319.



LIBRARY SEARCH
04/22/81 8:54:00 + 4:20
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ1SR51 # 260
CALI: CAL331 # 1

BASE M/E: 105
RIC: 295935.

1034
SAMPLE

C9.H12 BENZENE, 1,2,4-TRIMETHYL-

1034
M WT 120
3 PK 105
RANK 1
IN 2523
PUR 886

C9.H12 BENZENE, 1,3,5-TRIMETHYL-

1034
M WT 120
B PK 105
RANK 2
IN 2526
PUR 882

C9.H12 BENZENE, 1,2,3-TRIMETHYL-

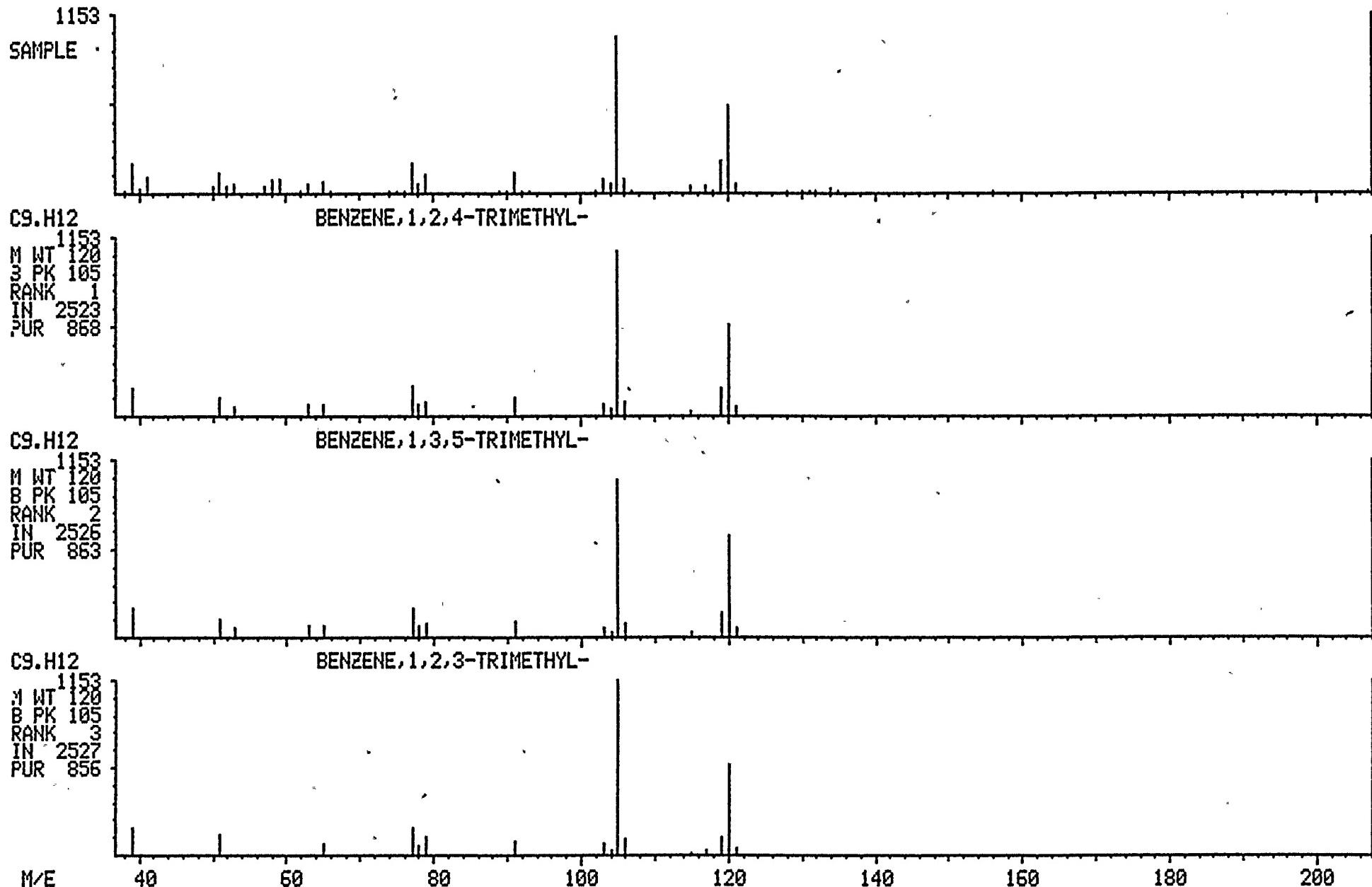
1034
M WT 120
B PK 105
RANK 3
IN 2527
PUR 879

M/E 50 100 150 200

LIBRARY SEARCH
04/22/81 8:54:00 + 4:30
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UVQ15R51 # 270
CALI: CAL331 # 1

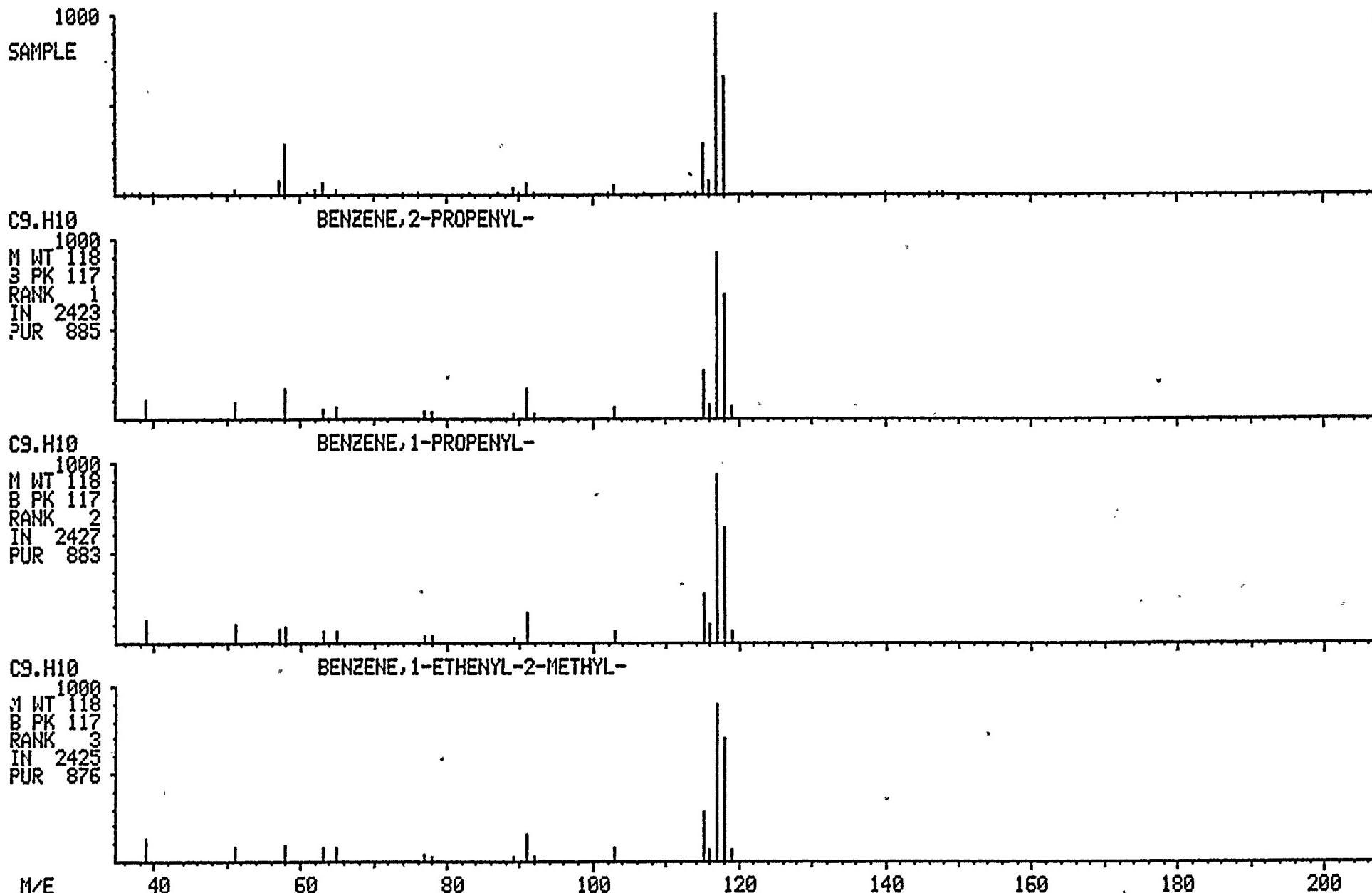
BASE M/E: 105
RIC: 315903.



LIBRARY SEARCH
04/22/81 8:54:00 + 4:34
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 274
CALI: CAL331 # 1

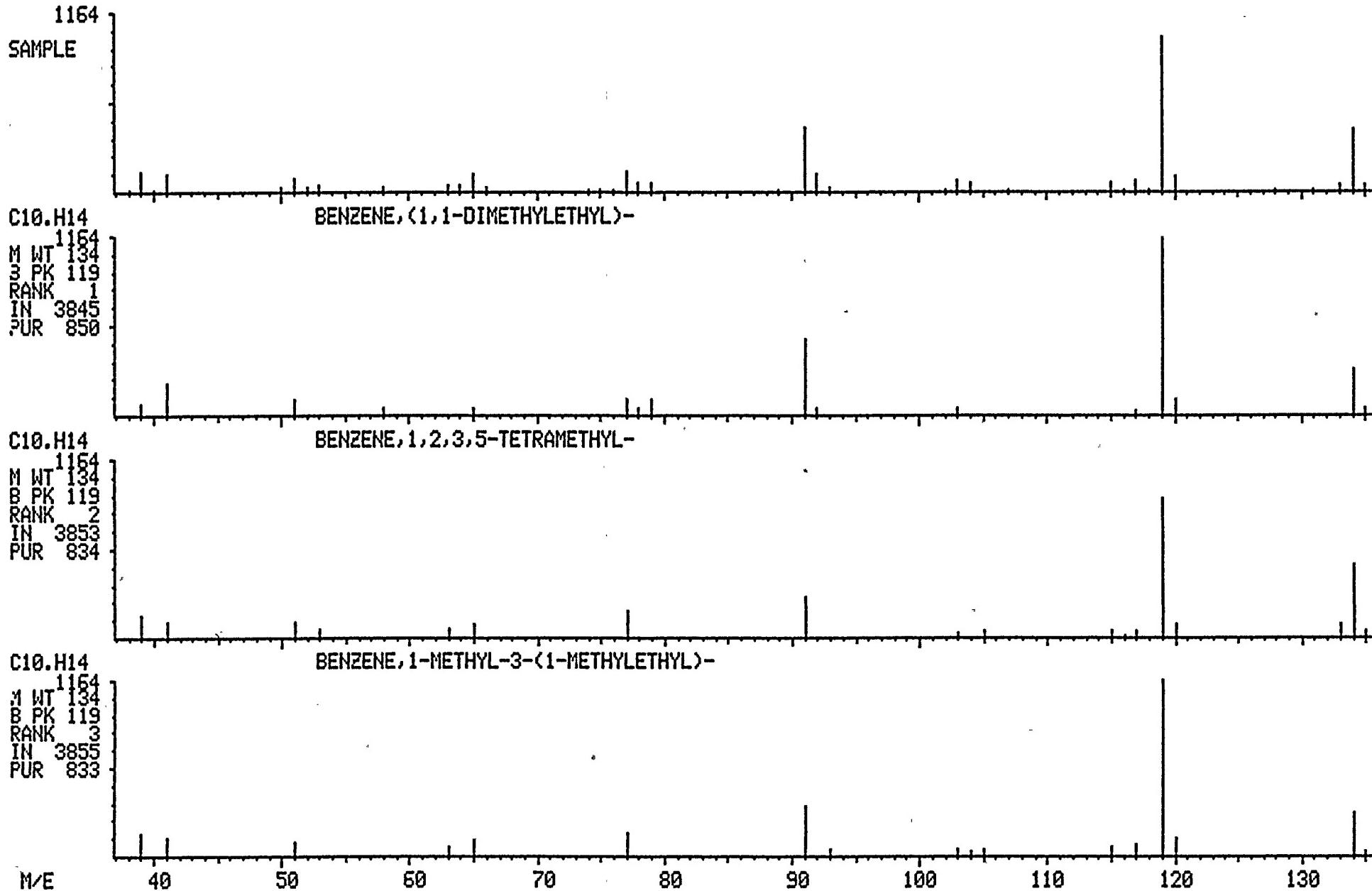
BASE M/E: 117
RIC: 55359.



LIBRARY SEARCH
04/22/81 8:54:00 + 4:42
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UYQ15R51 # 282
CALI: CAL331 # 1

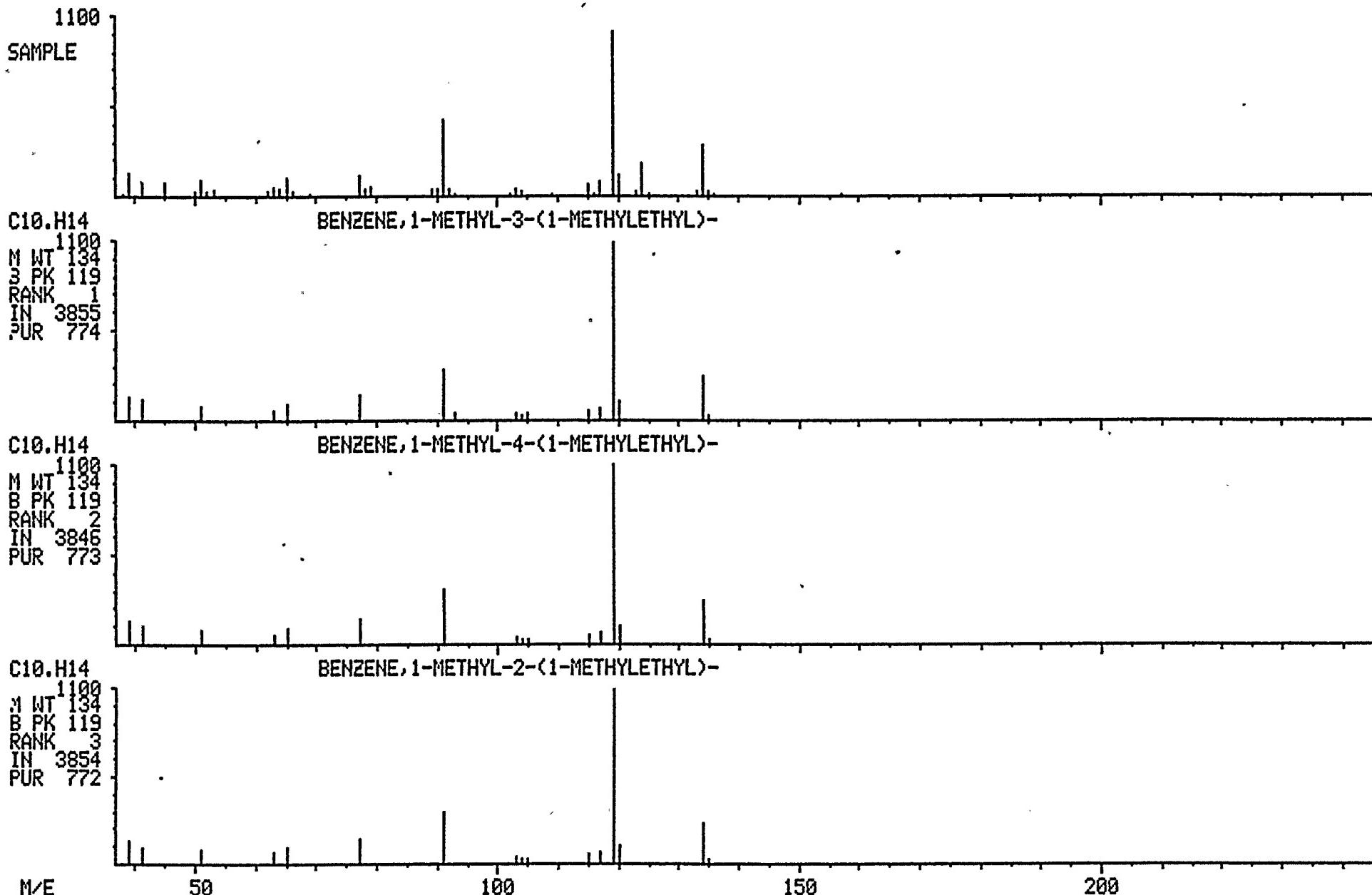
BASE M/E: 119
RIC: 415743.



LIBRARY SEARCH
04/22/81 8:54:00 + 4:49
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UYQ1SR51 # 289
CALI: CAL331 # 1

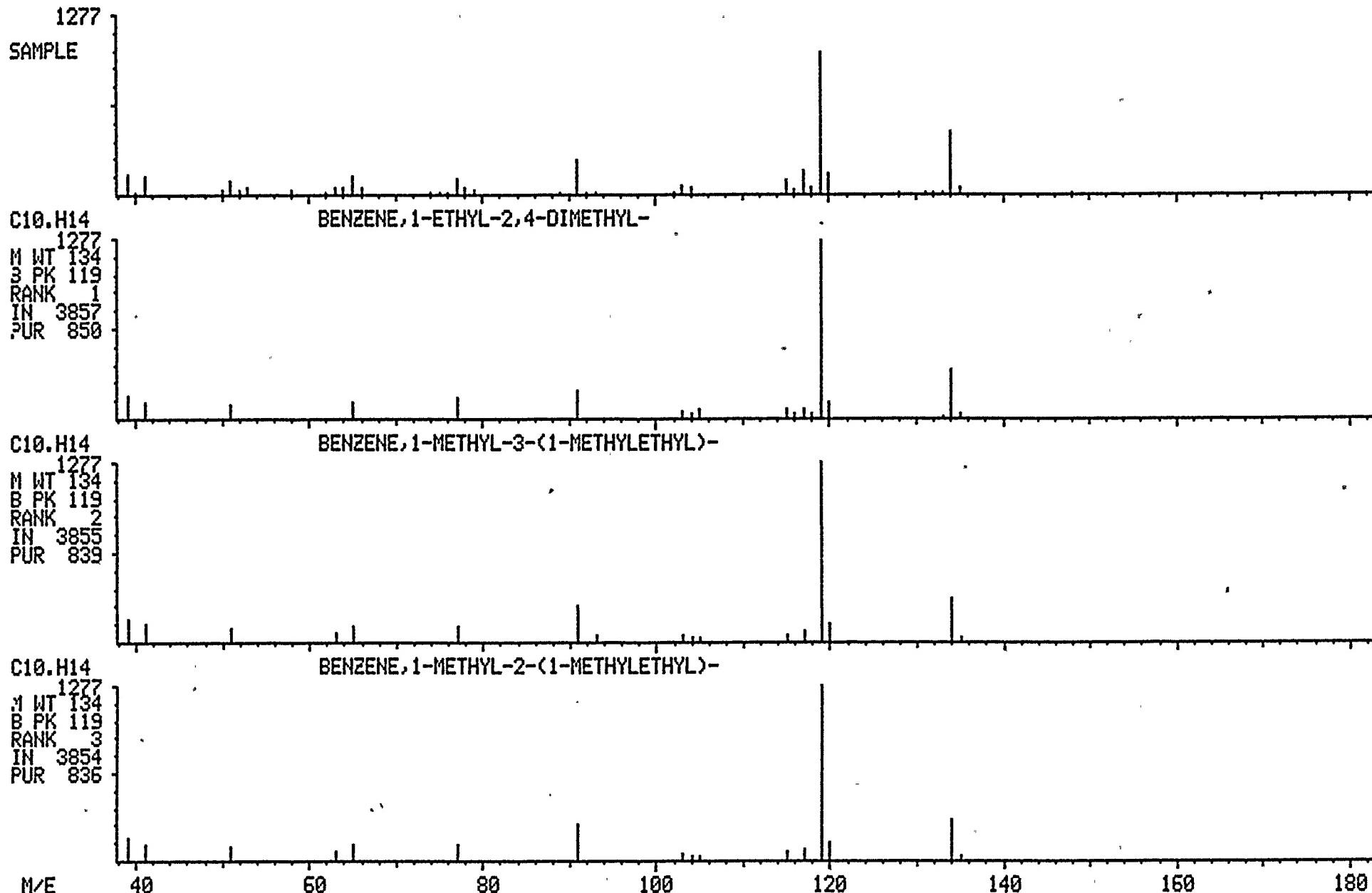
BASE M/E: 119
RIC: 475647.



LIBRARY SEARCH
04/22/81 8:54:00 + 4:53
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 293
CALI: CAL331 # 1

BASE M/E: 119
RIC: 409087.



LIBRARY SEARCH
04/22/81 8:54:00 + 4:59
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ1SR51 # 299
CALI: CAL331 # 1

BASE M/E: 119
RIC: 227071.

1121
SAMPLE

C10.H14
1121
M WT 134
3 PK 119
RANK 1
IN 3855
PUR 880

BENZENE, 1-METHYL-3-(1-METHYLETHYL)-

C10.H14
1121
M WT 134
B PK 119
RANK 2
IN 3854
PUR 878

BENZENE, 1-METHYL-2-(1-METHYLETHYL)-

C10.H14
1121
M WT 134
B PK 119
RANK 3
IN 3846
PUR 877

BENZENE, 1-METHYL-4-(1-METHYLETHYL)-

M/E 40 60 80 100 120 140 160 180 200

LIBRARY SEARCH
04/22/81 8:54:00 + 5:06
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ1SR51 # 305
CALI: CAL331 # 1

BASE M/E: 119
RIC: 420351.

1447
SAMPLE

C10.H14
M WT 134
B PK 119
RANK 1
IN 3853
PUR 855

BENZENE, 1,2,3,5-TETRAMETHYL-

C10.H14
M WT 134
B PK 119
RANK 2
IN 3852
PUR 825

BENZENE, 1,2,3,4-TETRAMETHYL-

C10.H14
M WT 134
B PK 119
RANK 3
IN 3857
PUR 812

BENZENE, 1-ETHYL-2,4-DIMETHYL-

M/E 40 60 80 100 120 140 160 180

LIBRARY SEARCH
04/22/81 8:54:00 + 5:11
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UVQ1SR51 # 311
CALI: CAL331 # 1

BASE M/E: 117
RIC: 276479.

1098
SAMPLE

C10.H12
1098
M WT 132
B PK 117
RANK 1
IN 3653
PUR 780

1H-INDENE,2,3-DIHYDRO-4-METHYL-

C10.H12
1098
M WT 132
B PK 117
RANK 2
IN 3655
PUR 778

1H-INDENE,2,3-DIHYDRO-5-METHYL-

C10.H12
1098
M WT 132
B PK 132
RANK 3
IN 3663
PUR 750

BENZENE,1-ETHENYL-3,5-DIMETHYL-

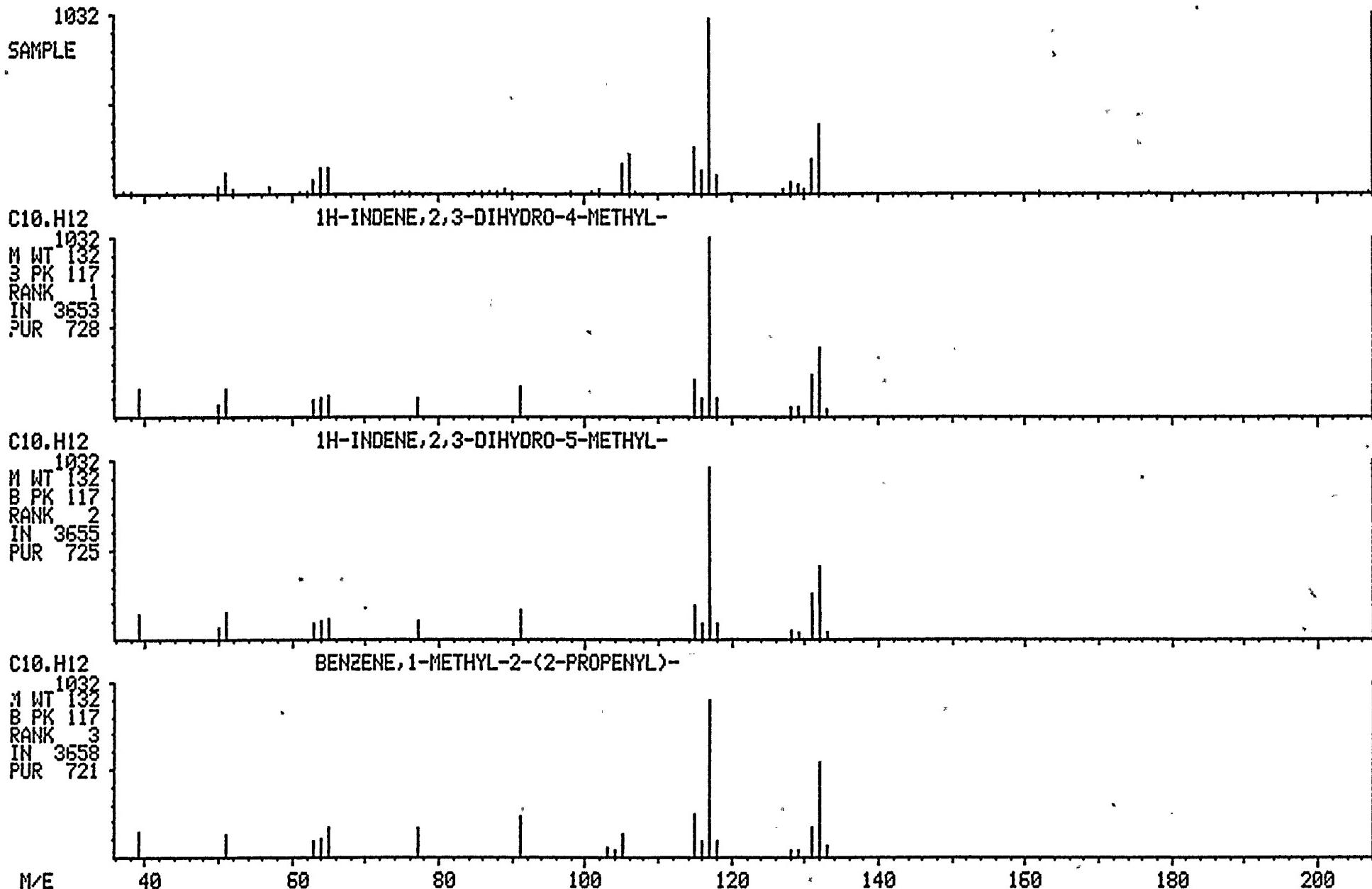
M/E

40 60 80 100 120 140 160 180

LIBRARY SEARCH
04/22/81 8:54:00 + 5:15
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ1SR51 # 315
CALI: CAL331 # 1

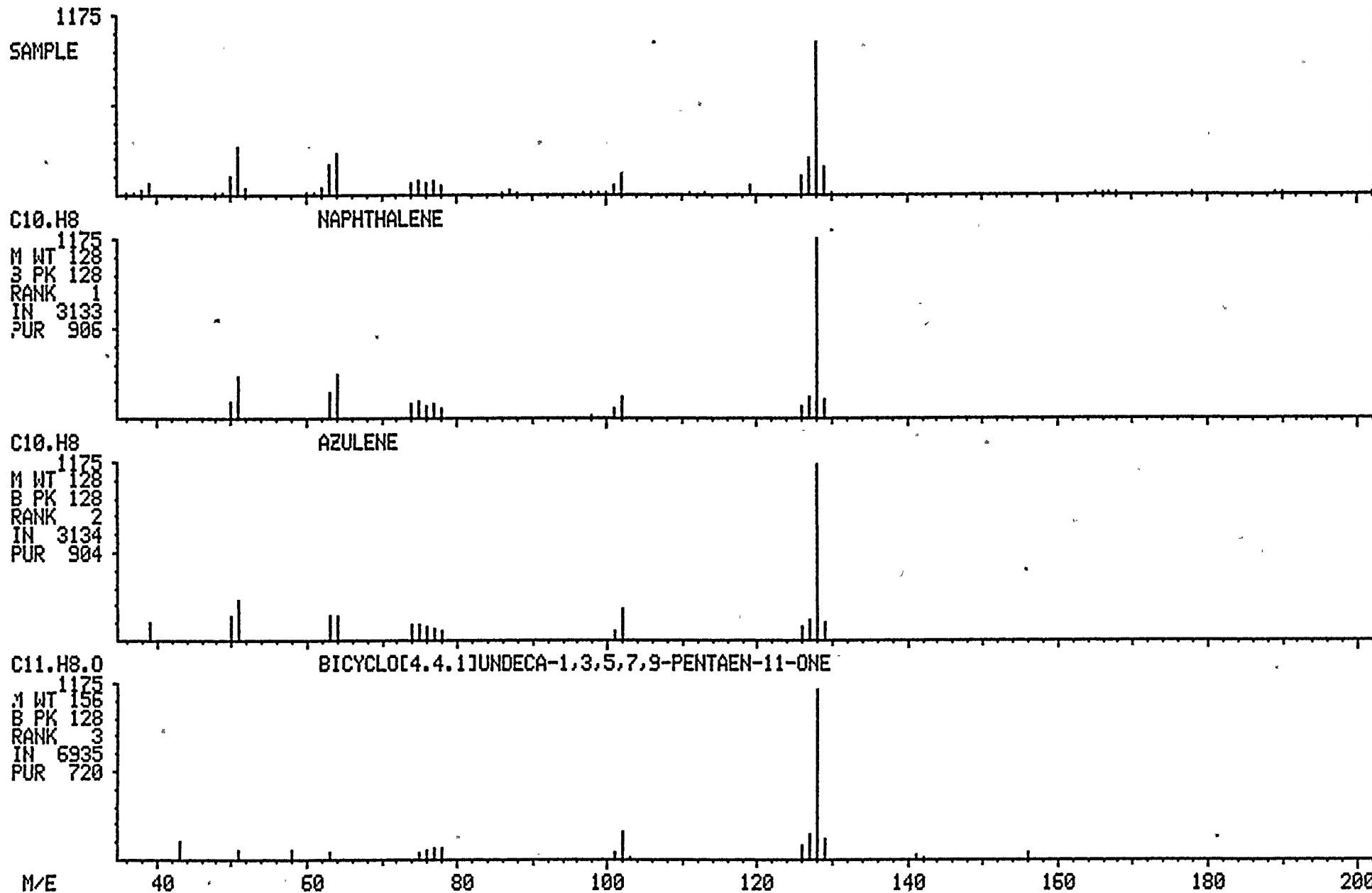
BASE M/E: 117
RIC: 274431.



LIBRARY SEARCH
04/22/81 8:54:00 + 5:29
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: VYQ15R51 # 329
CALI: CAL331 # 1

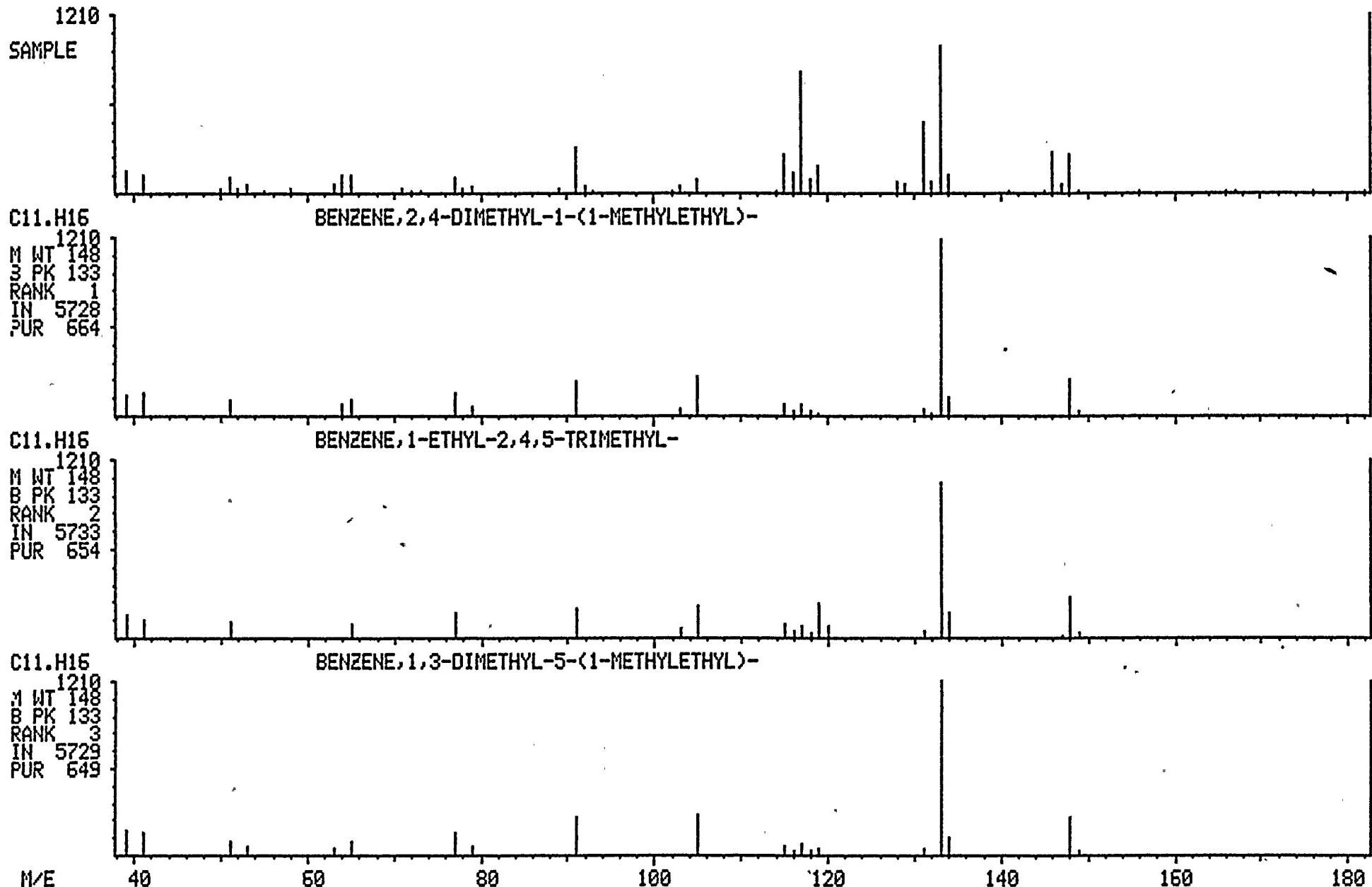
BASE M/E: 128
RIC: 517119.



LIBRARY SEARCH
04/22/81 8:54:00 + 5:43
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ1SR51 # 343
CALI: CAL331 # 1

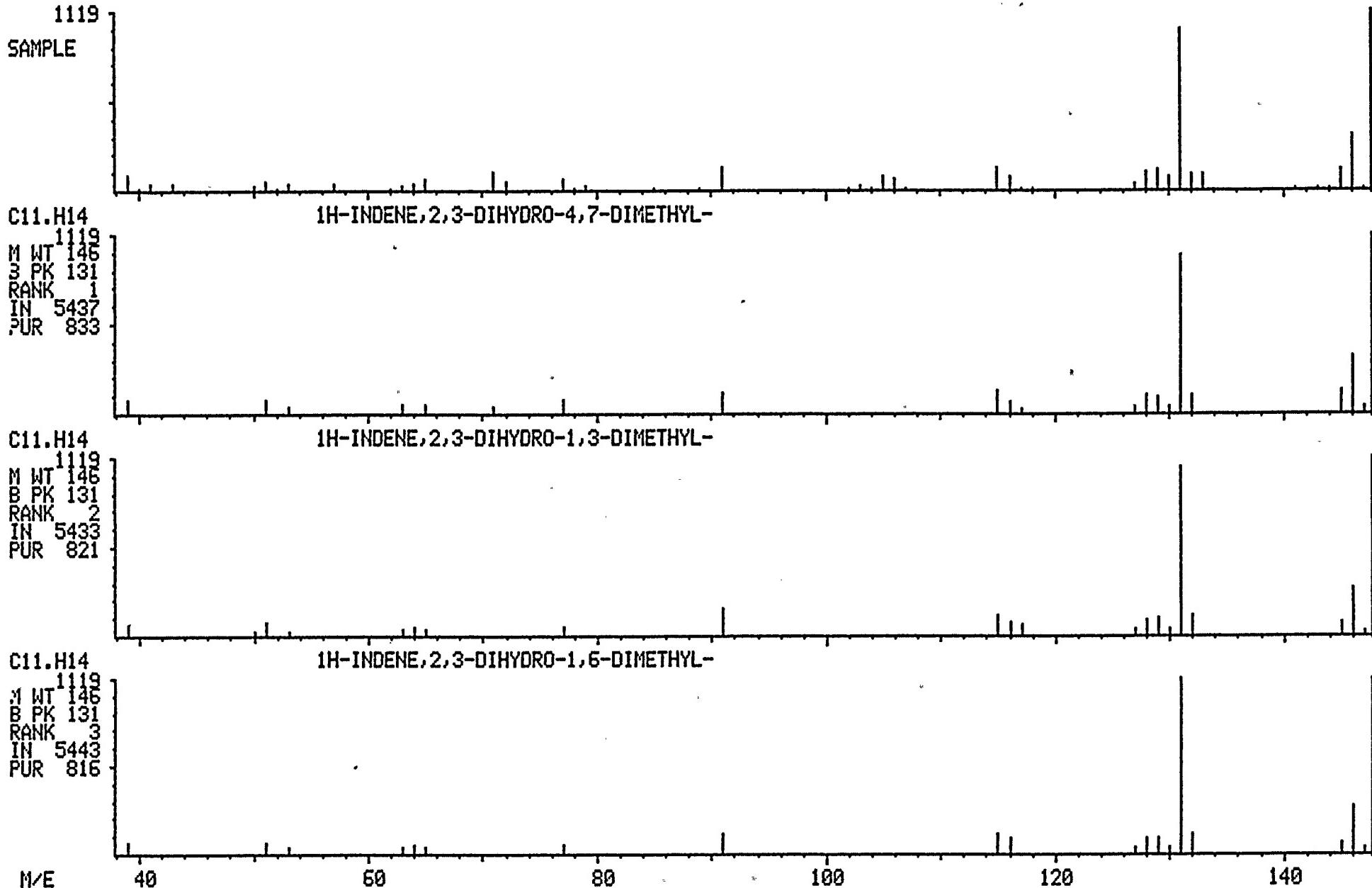
BASE M/E: 133
RIC: 77311.



LIBRARY SEARCH
04/22/81 8:54:00 + 5:49
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UYQ15R51 # 349
CALI: CAL331 # 1

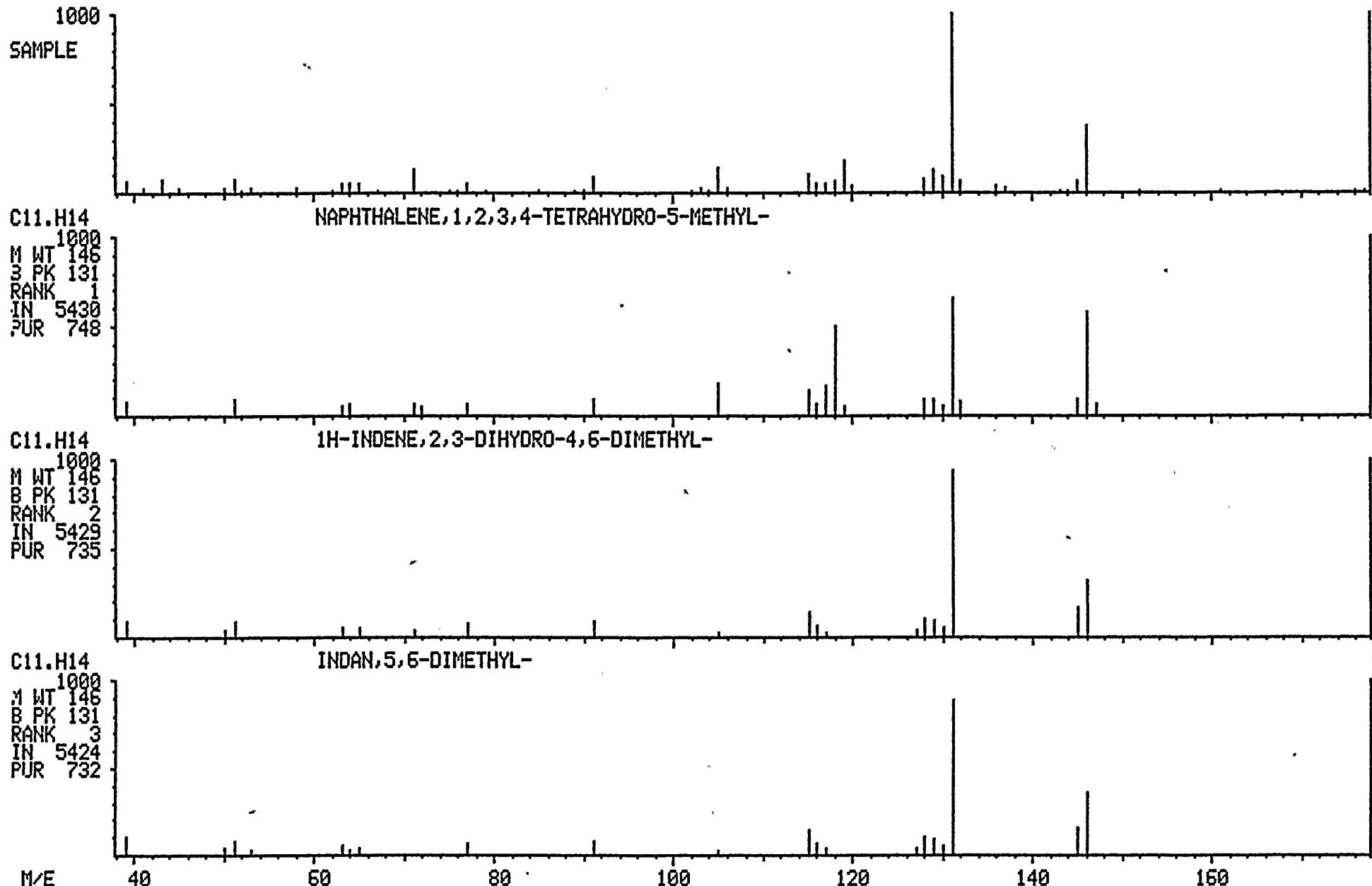
BASE M/E: 131
RIC: 62335.



LIBRARY SEARCH
04/22/81 8:54:00 + 5:54
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UYQ15R51 # 354
CALI: CAL331 # 1

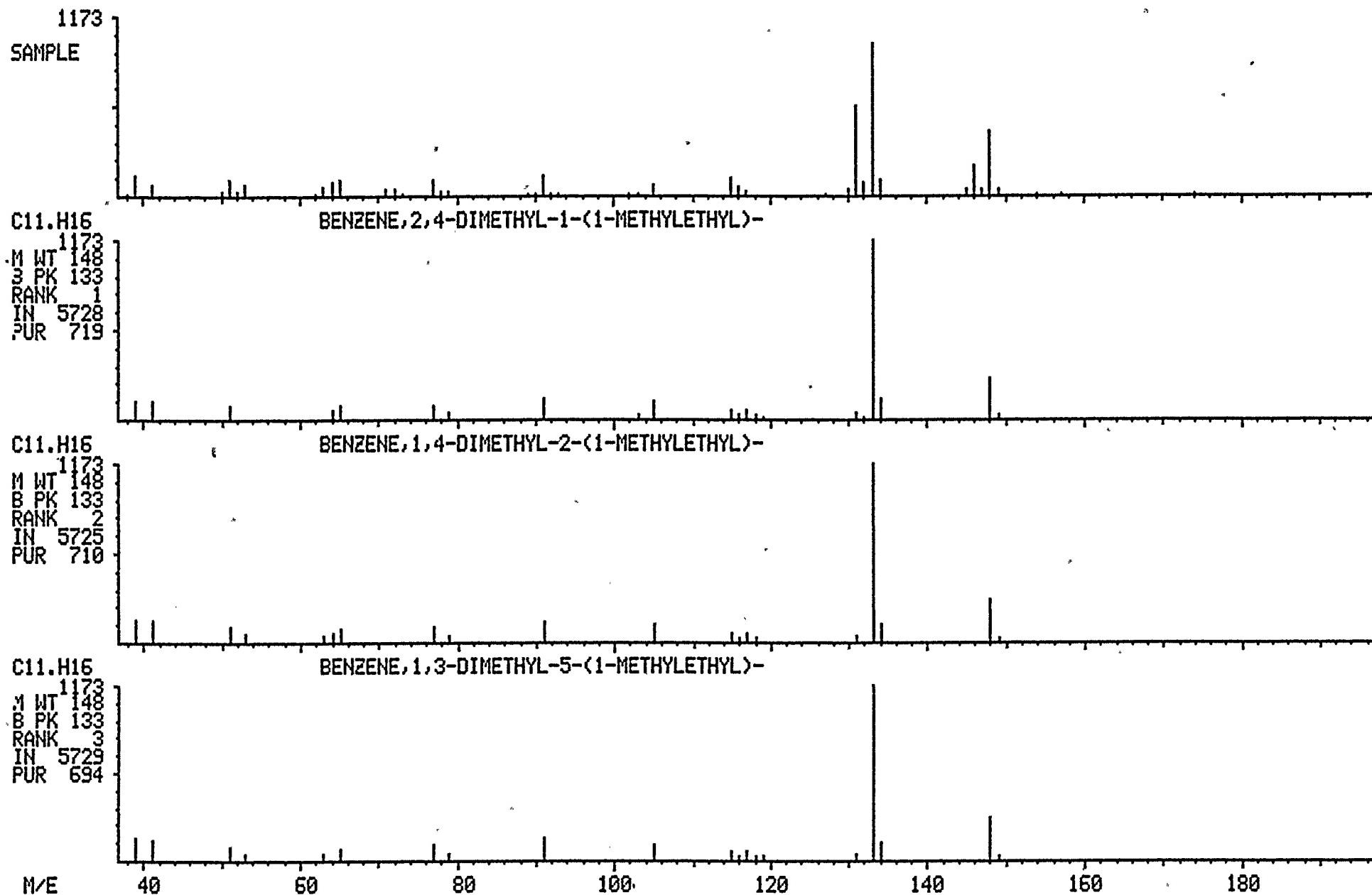
BASE M/E: 131
RIC: 32031.



LIBRARY SEARCH
04/22/81 8:54:00 + 6:01
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: VYQ1SR51 # 361
CALI: CAL331 # 1

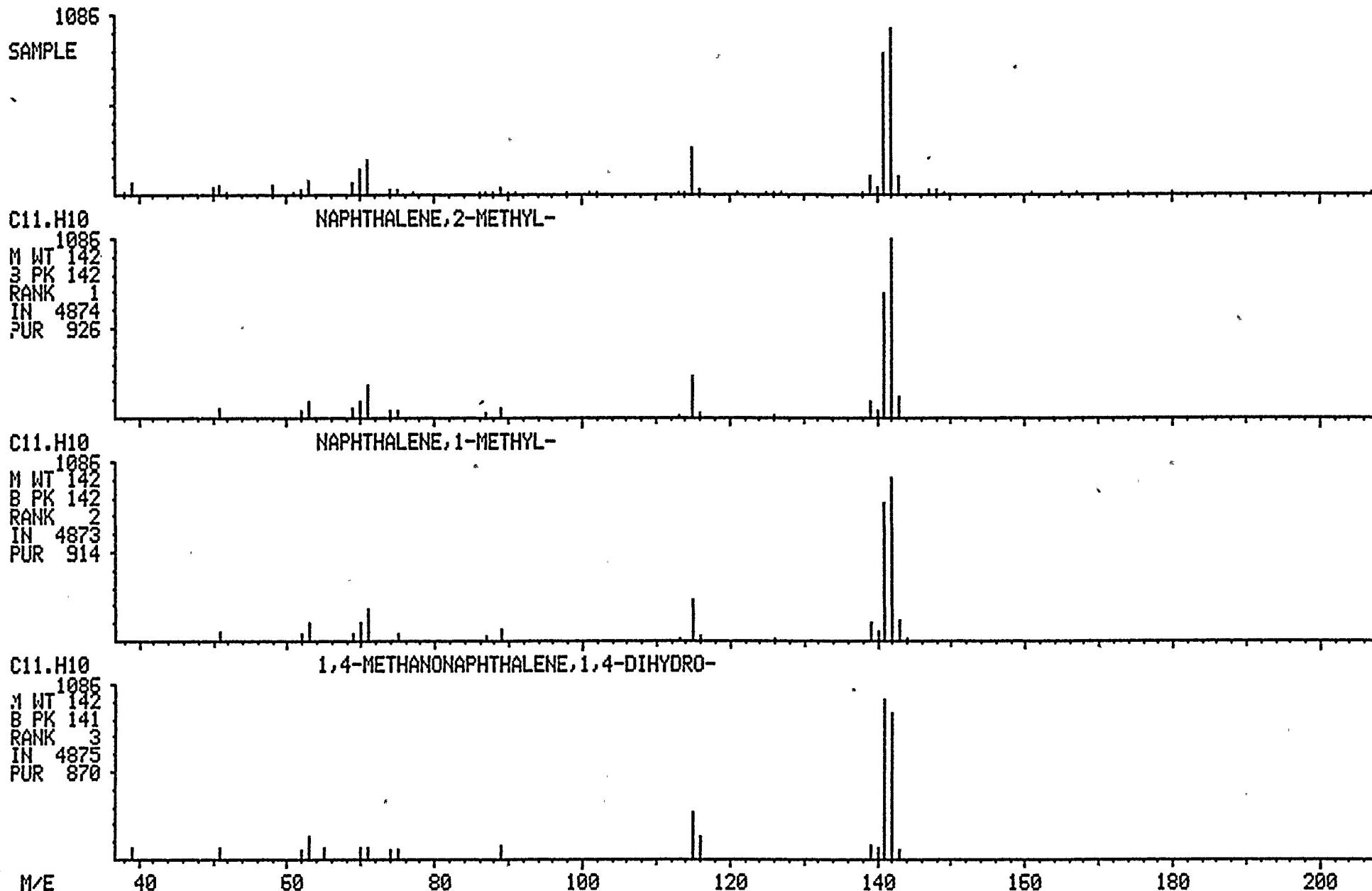
BASE M/E: 133
RIC: 38271.



LIBRARY SEARCH
04/22/81 8:54:00 + 6:07
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 357
CALI: CAL331 # 1

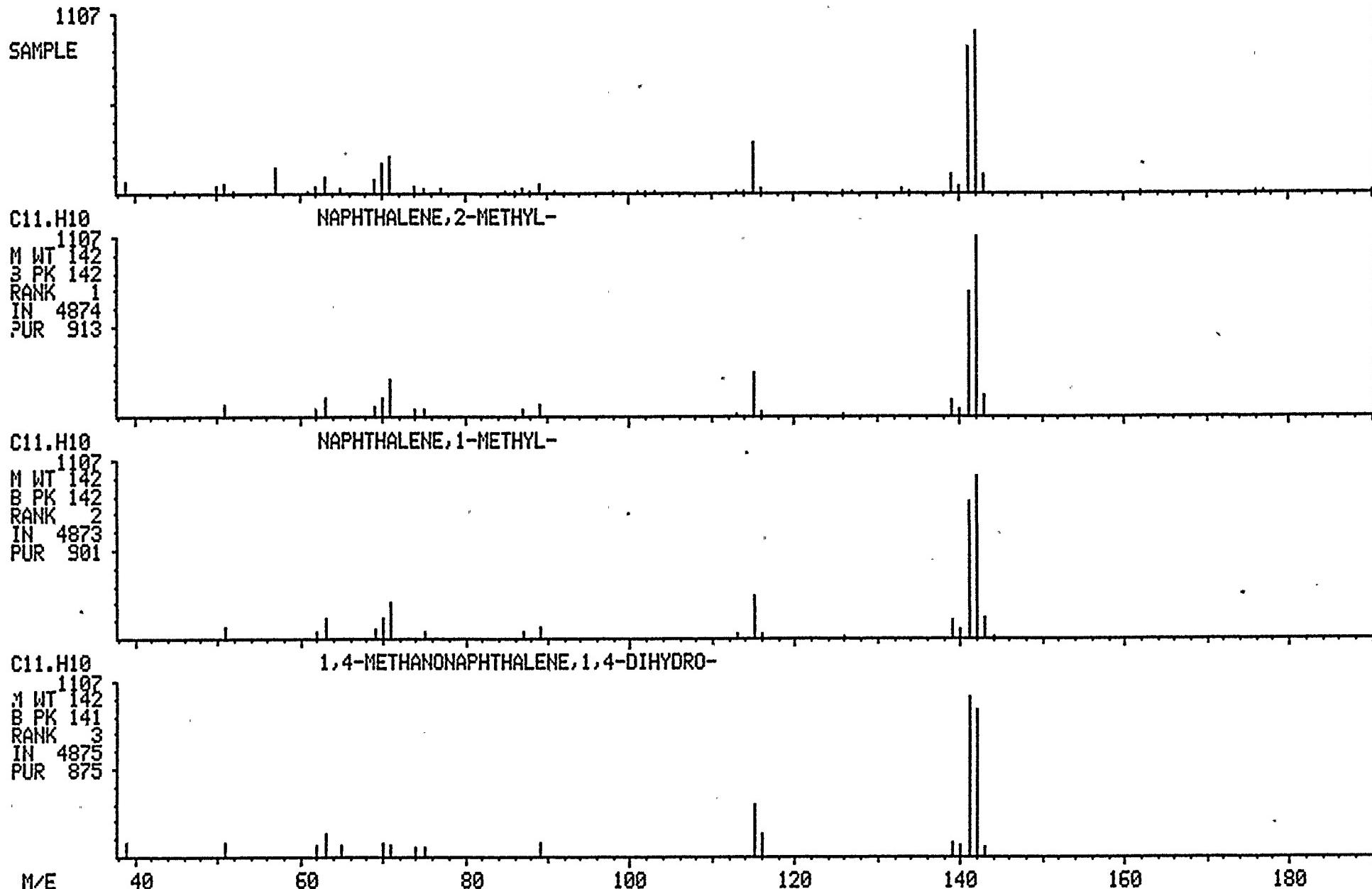
BASE M/E: 142
RIC: 159999.



LIBRARY SEARCH
04/22/81 8:54:00 + 6:13
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: VYQ1SR51 # 373
CALI: CAL331 # 1

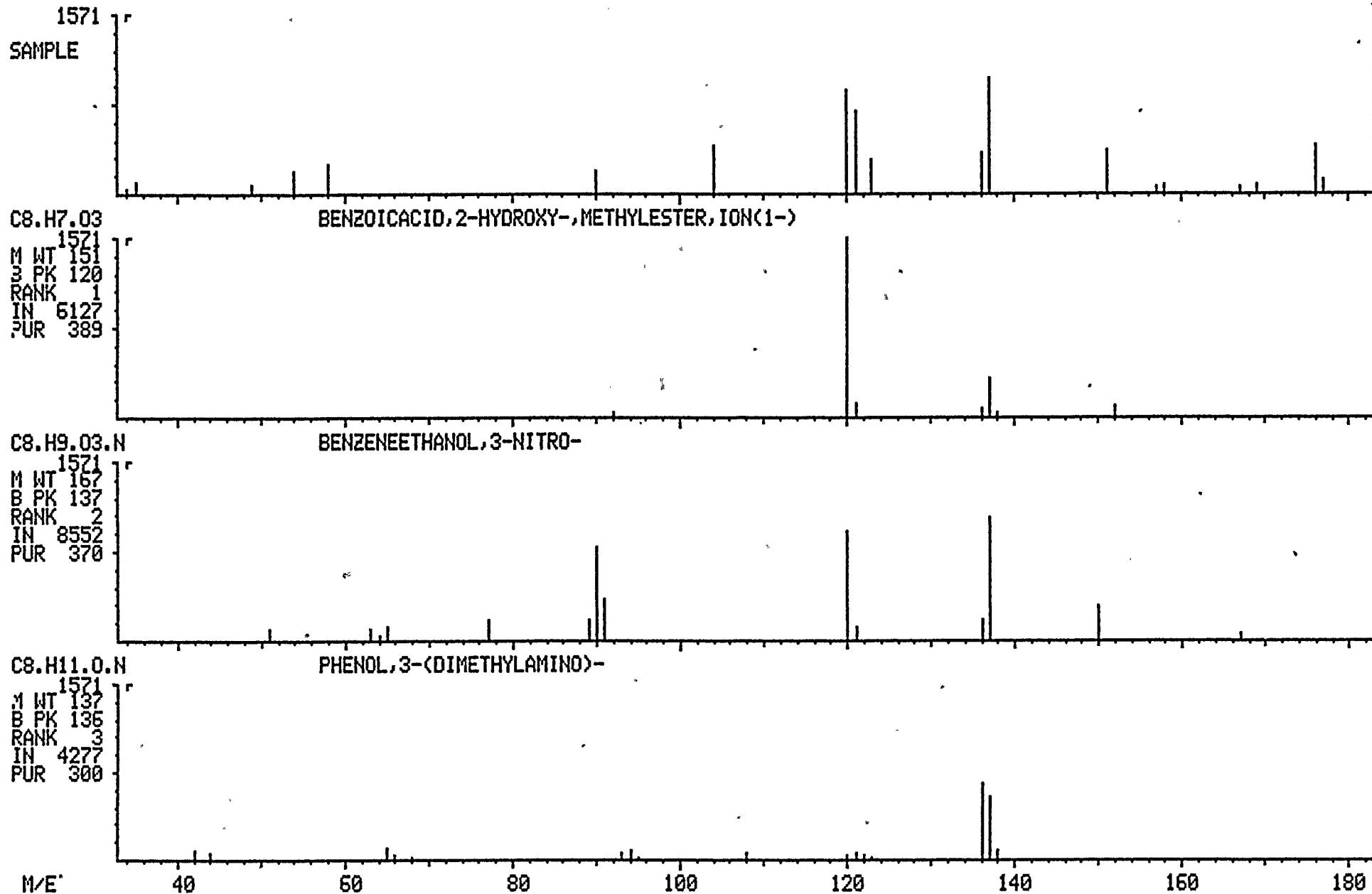
BASE M/E: 142
RIC: 66047.



LIBRARY SEARCH
04/22/81 8:54:00 + 6:20
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: VYQ1SR51 # 380
CALI: CAL331 # 1

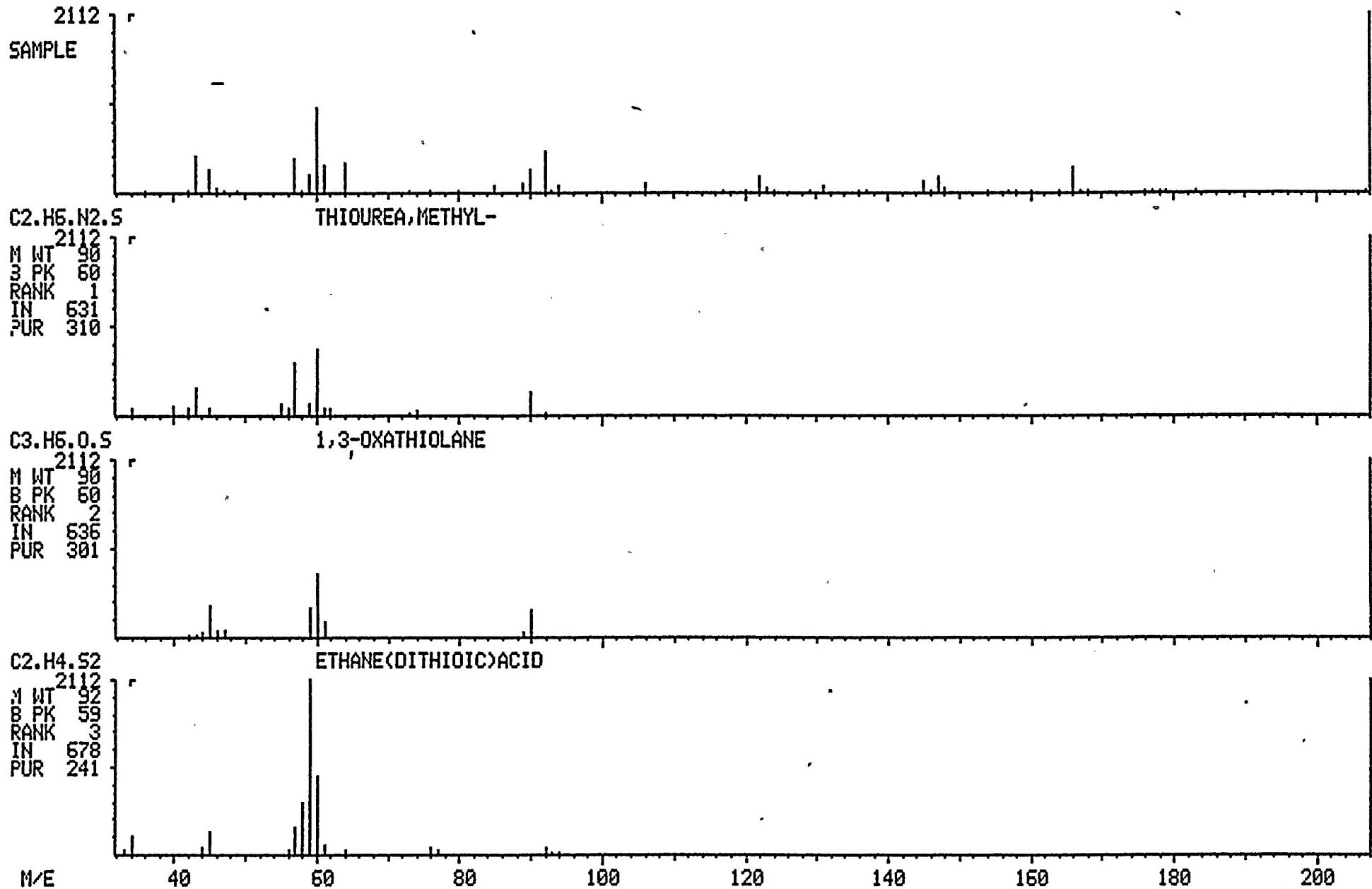
BASE M/E: 137
RIC: 607.



LIBRARY SEARCH
04/22/81 8:54:00 + 6:25
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

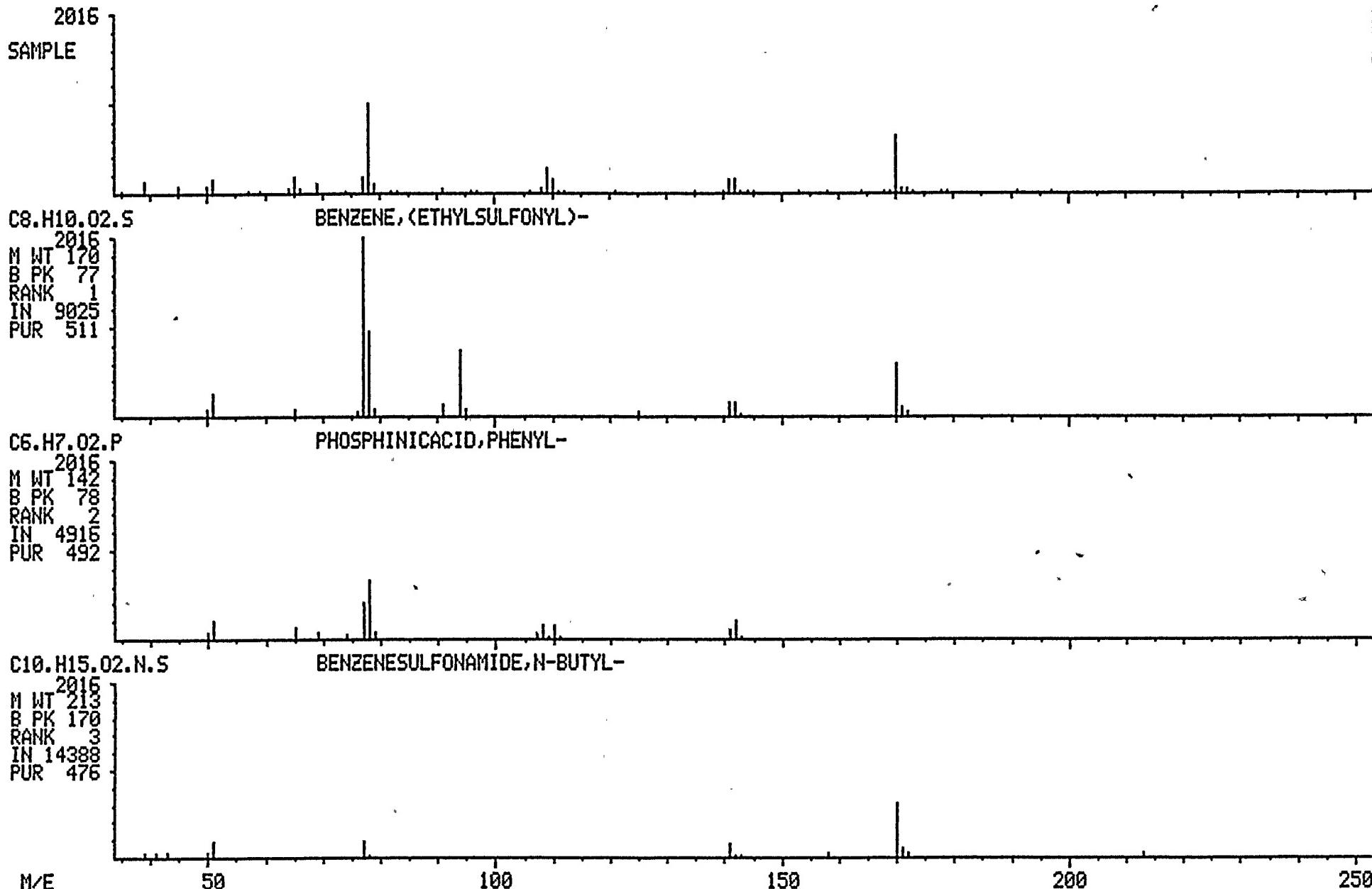
DATA: UYQ1SR51 # 385
CALI: CAL331 # 1

BASE M/E: 60
RIC: 8183.



LIBRARY SEARCH
04/22/81 8:54:00 + 6:31
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

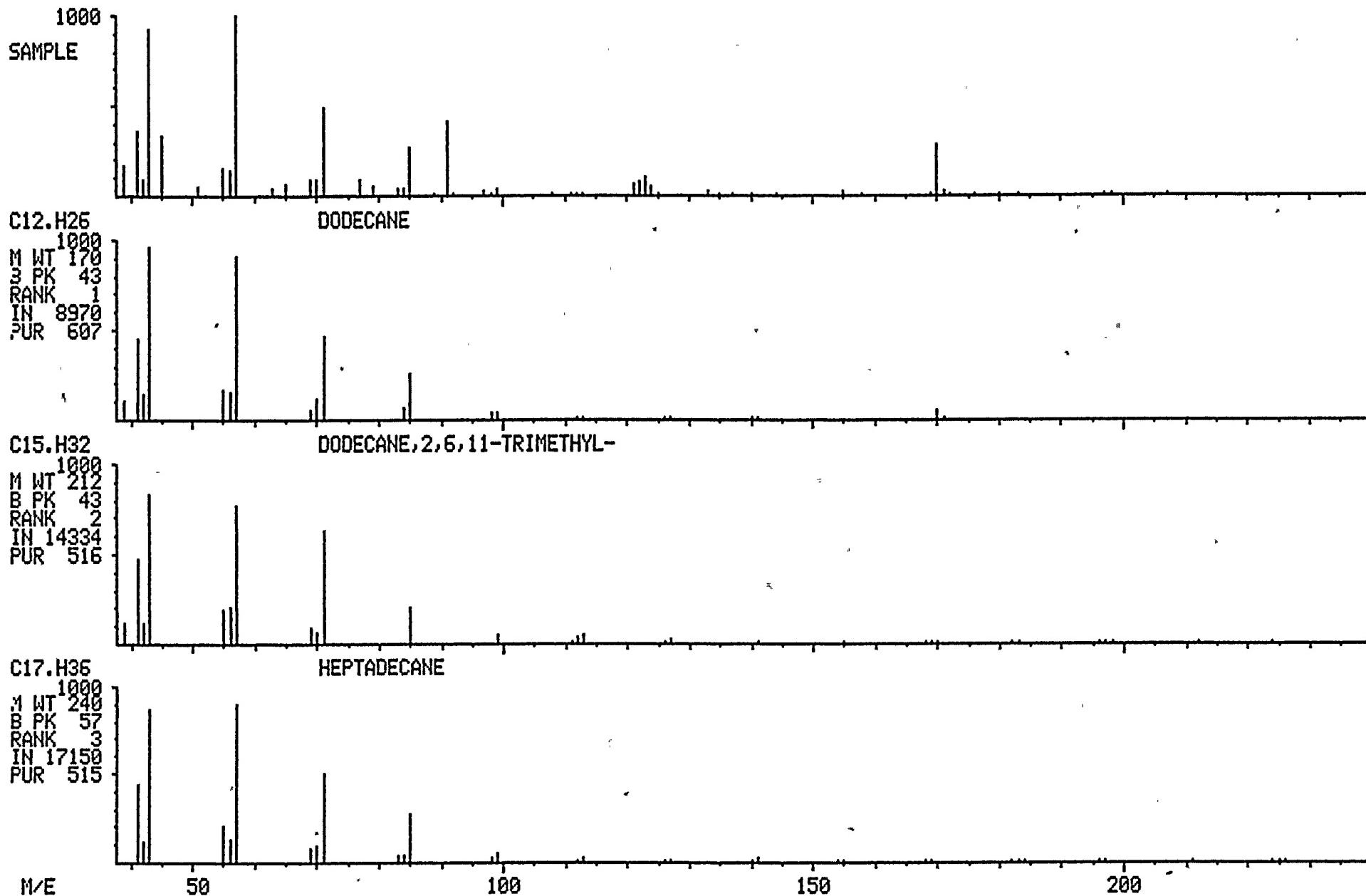
DATA: UVQ15R51 # 391 BASE M/E: 78
CALI: CAL331 # 1 RIC: 27583.



LIBRARY SEARCH
04/22/81 8:54:00 + 6:41
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: VYQ15R51 # 401
CALI: CAL331 # 1

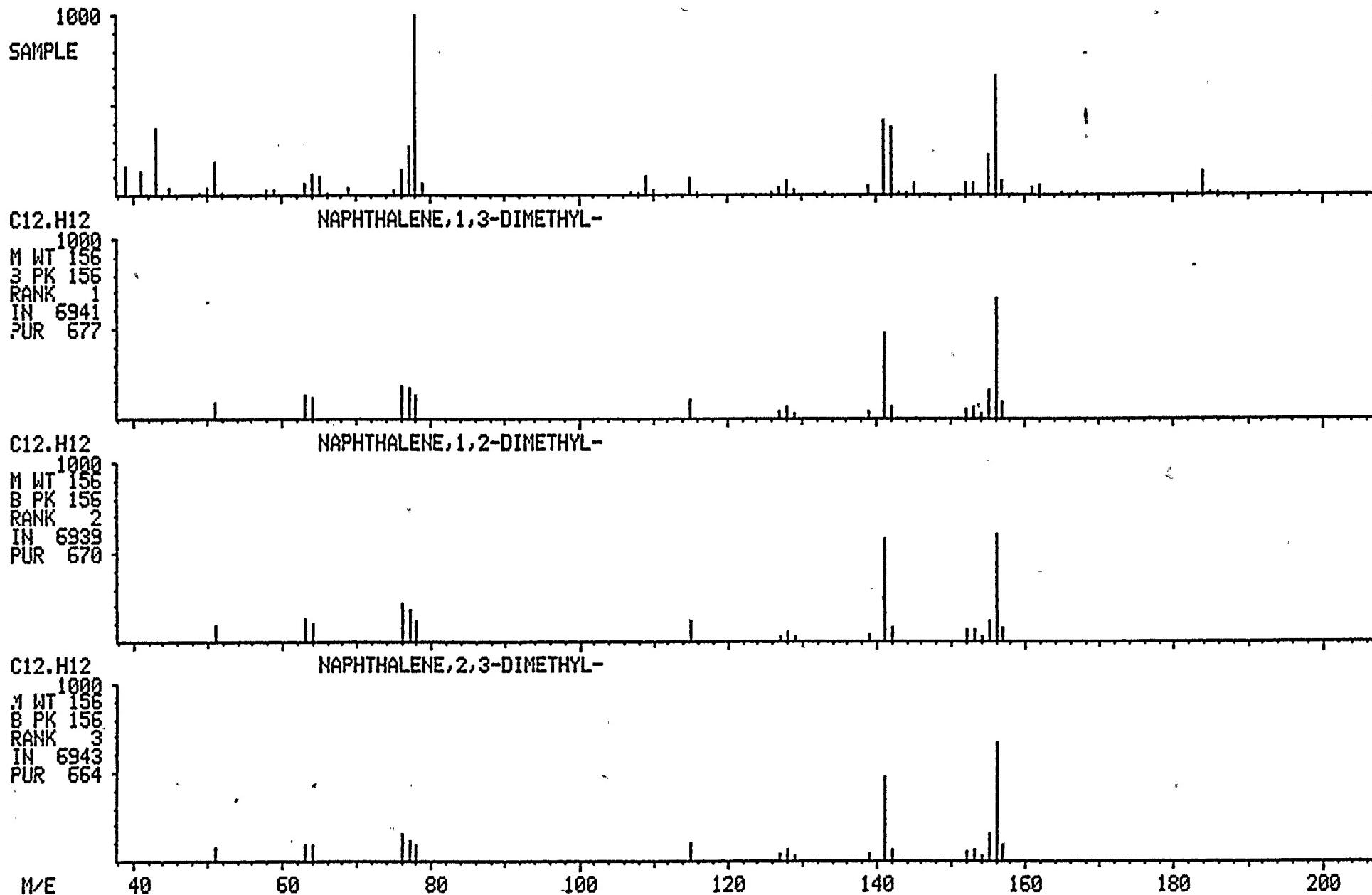
BASE M/E: 57
RIC: 18175.



LIBRARY SEARCH
04/22/81 8:54:00 + 6:50
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UVQ15R51 # 410
CALI: CAL331 # 1

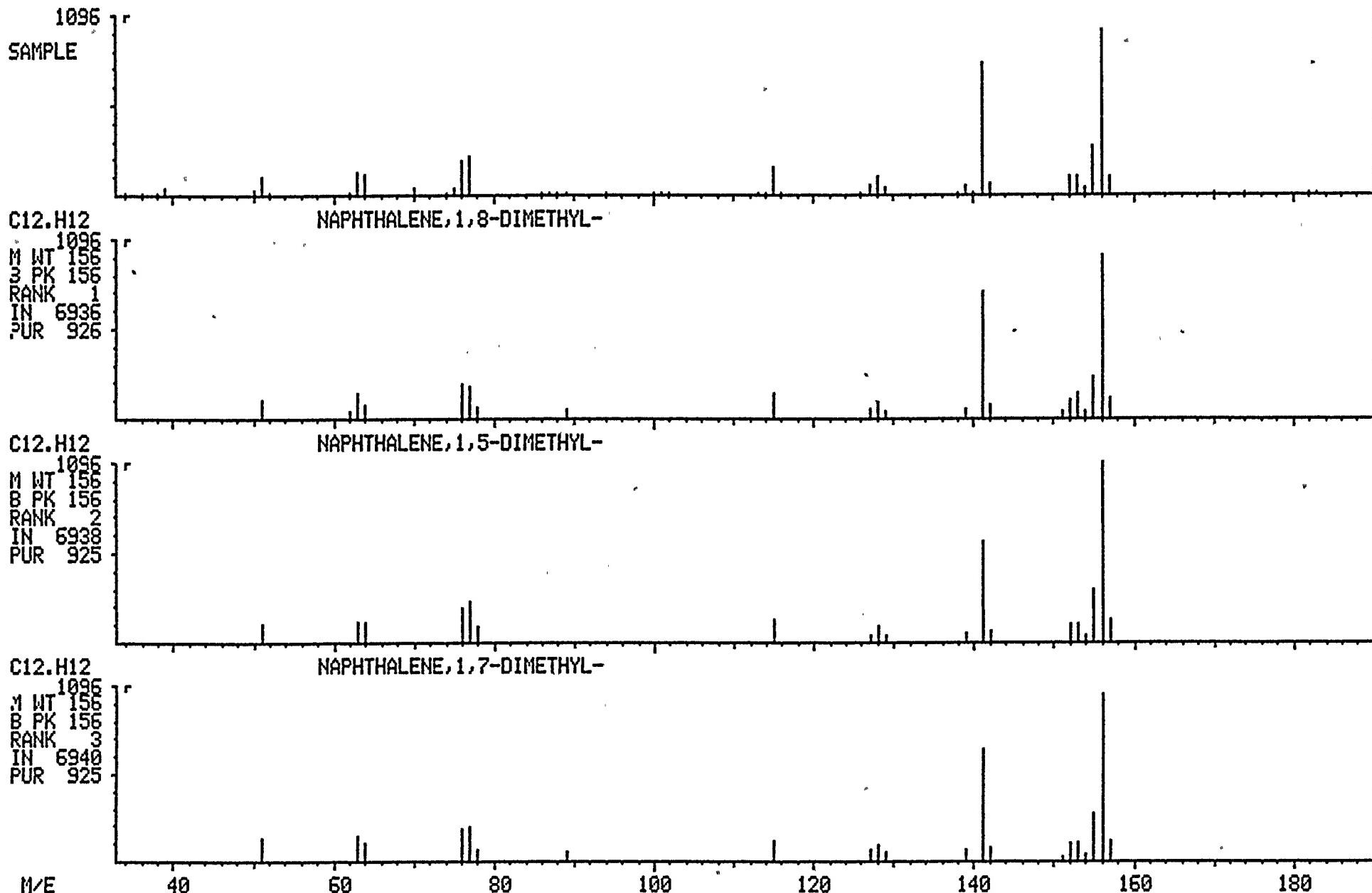
BASE M/E: 78
RIC: 13919.



LIBRARY SEARCH
04/22/81 8:54:00 + 6:55
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UVQ1SR51 # 415
CALI: CAL331 # 1

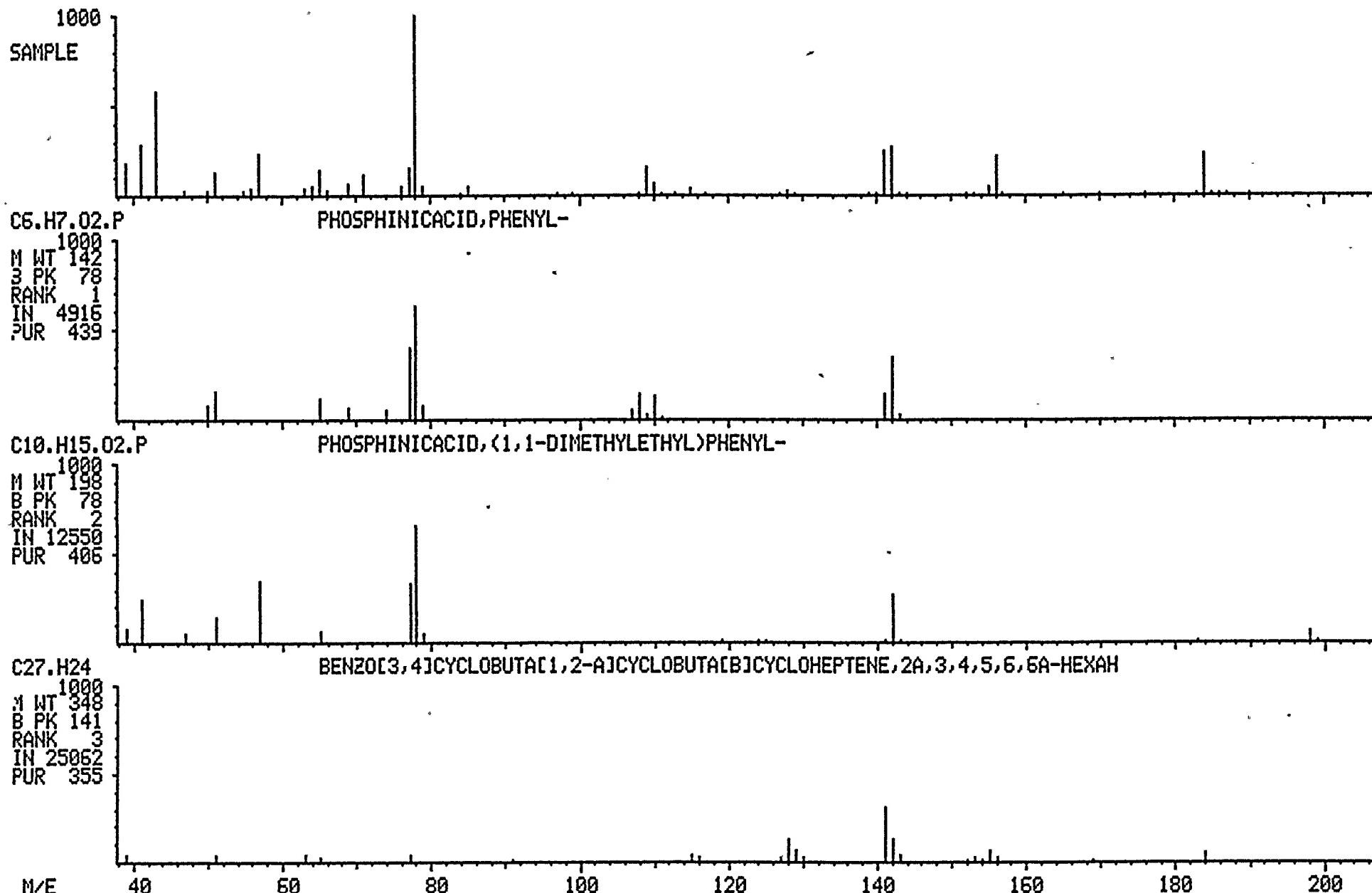
BASE M/E: 156
RIC: 12415.



LIBRARY SEARCH
04/22/81 8:54:00 + 7:06
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UVQ15R51 # 426
CALI: CAL331 # 1

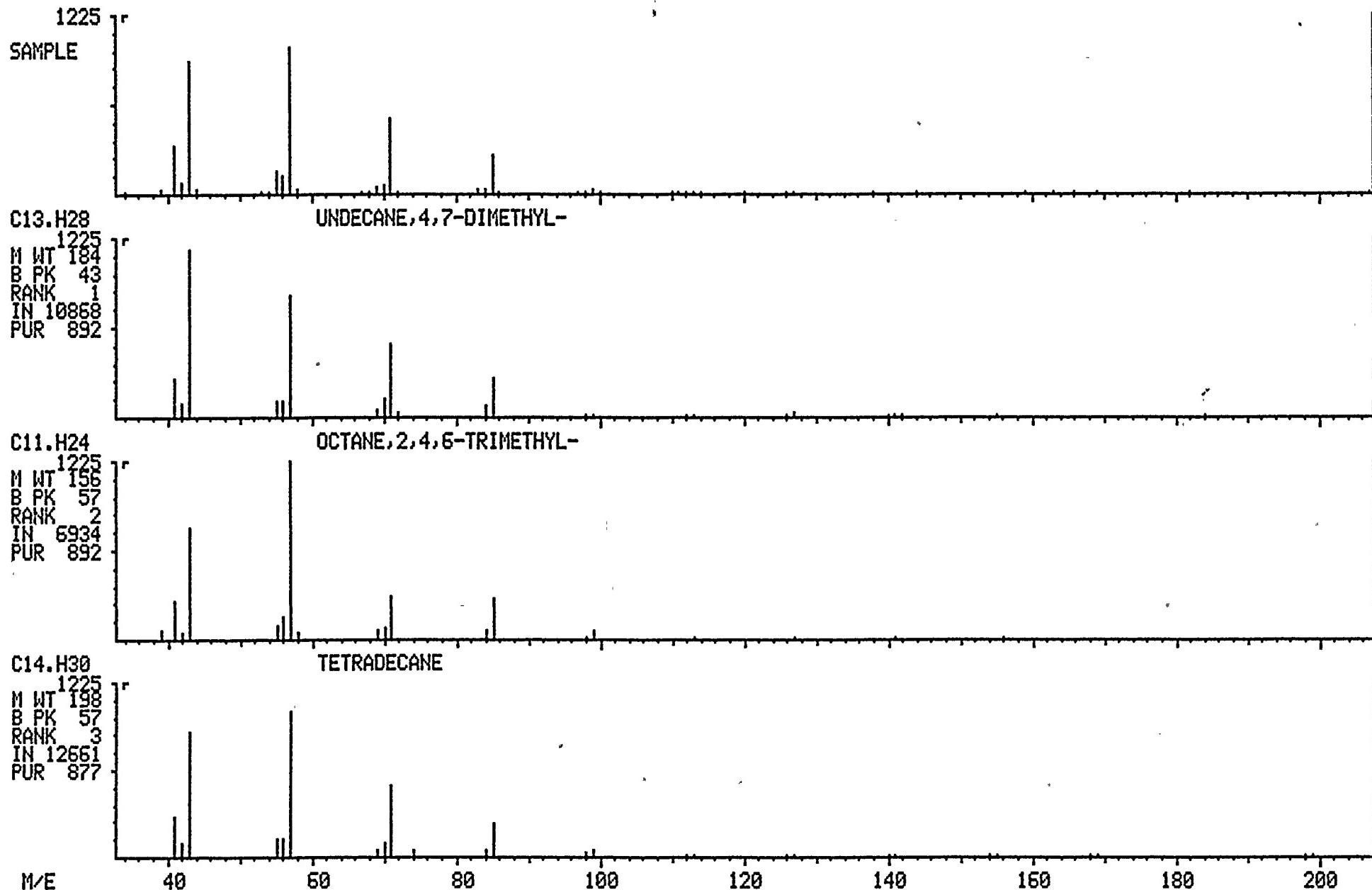
BASE M/E: 78
RIC: 13759.



LIBRARY SEARCH
04/22/81 8:54:00 + 7:20
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 440
CALI: CAL331 # 1

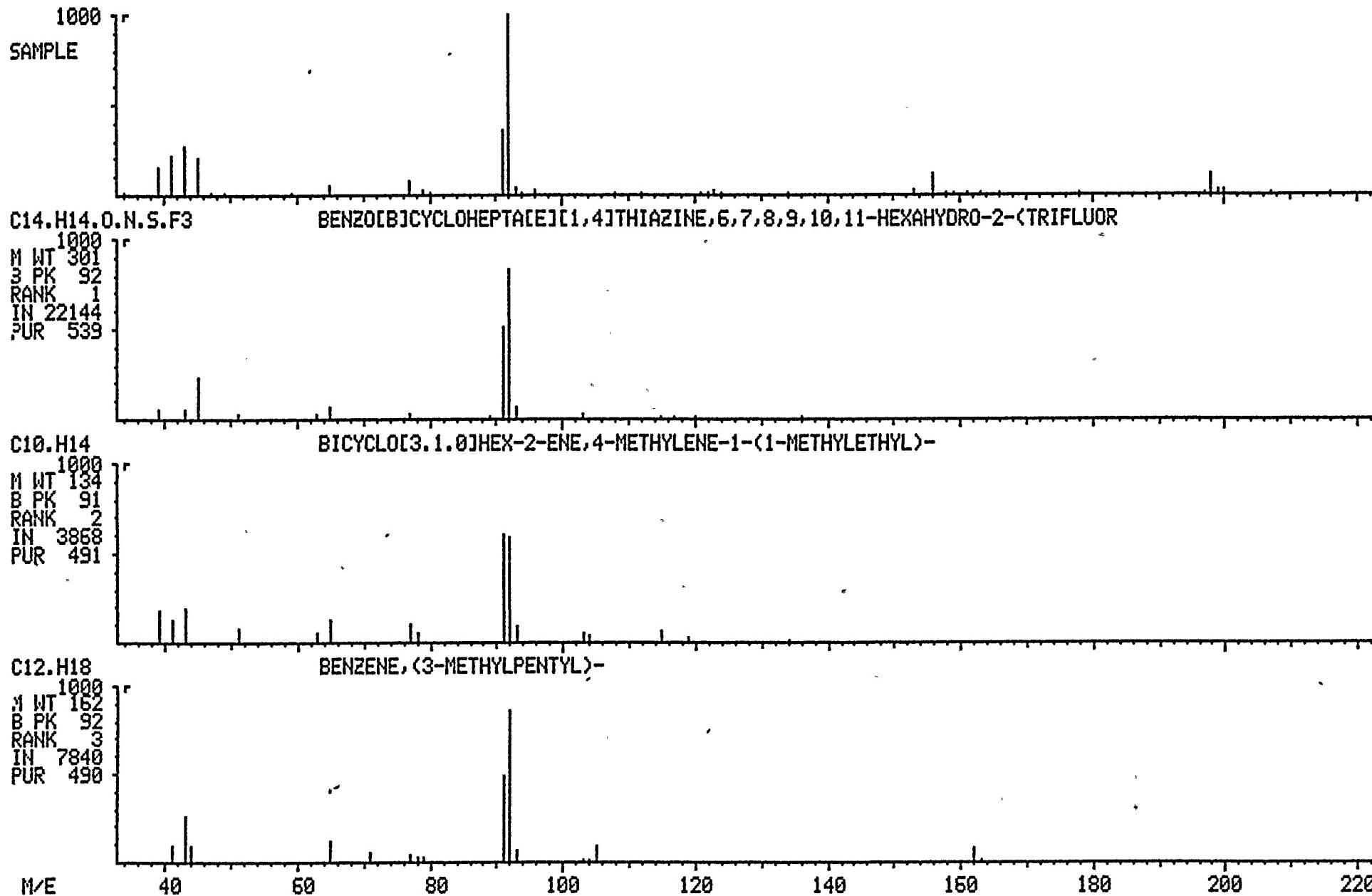
BASE M/E: 57
RIC: 7879.



LIBRARY SEARCH
04/22/81 8:54:00 + 7:27
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ15R51 # 447
CALI: CAL331 # 1

BASE M/E: 92
RIC: 2211.



LIBRARY SEARCH
04/22/81 8:54:00 + 7:32
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ1SR51 # 452
CALI: CAL331 # 1

BASE M/E: 155
RIC: 1327.

1053
SAMPLE

C13.H14
1053
M WT 178
B PK 155
RANK 1
IN 8987
PUR 775

NAPHTHALENE, 2-(1-METHYLETHYL)-

C13.H14
1053
M WT 178
B PK 155
RANK 2
IN 8990
PUR 700

NAPHTHALENE, (1-METHYLETHYL)-

C13.H14
1053
M WT 178
B PK 178
RANK 3
IN 8986
PUR 663

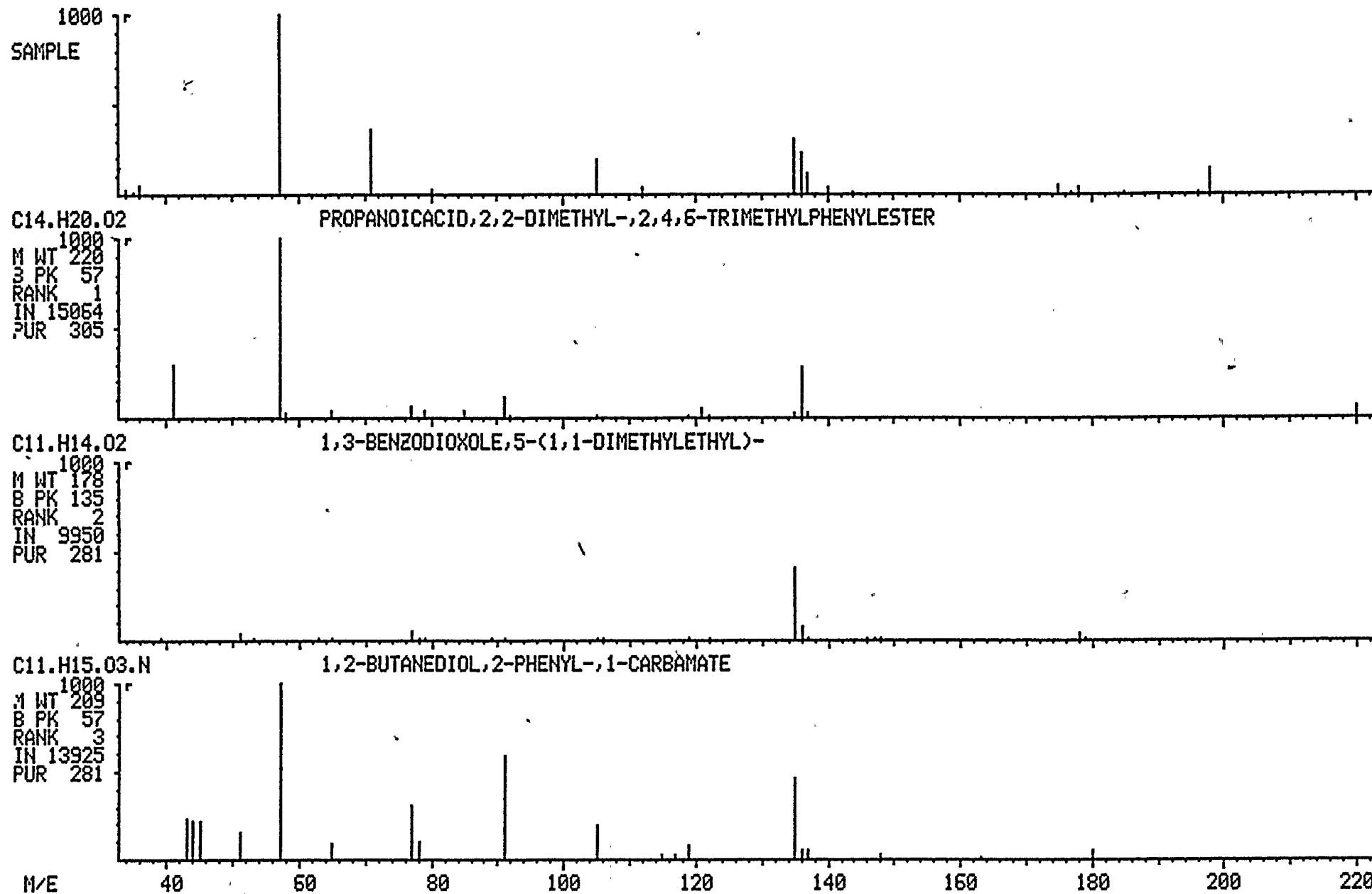
NAPHTHALENE, 2,3,6-TRIMETHYL-

M/E 50 100 150 200 250

LIBRARY SEARCH
04/22/81 8:54:00 + .7:38
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: VYQ15R51 # 458
CALI: CAL331 # 1

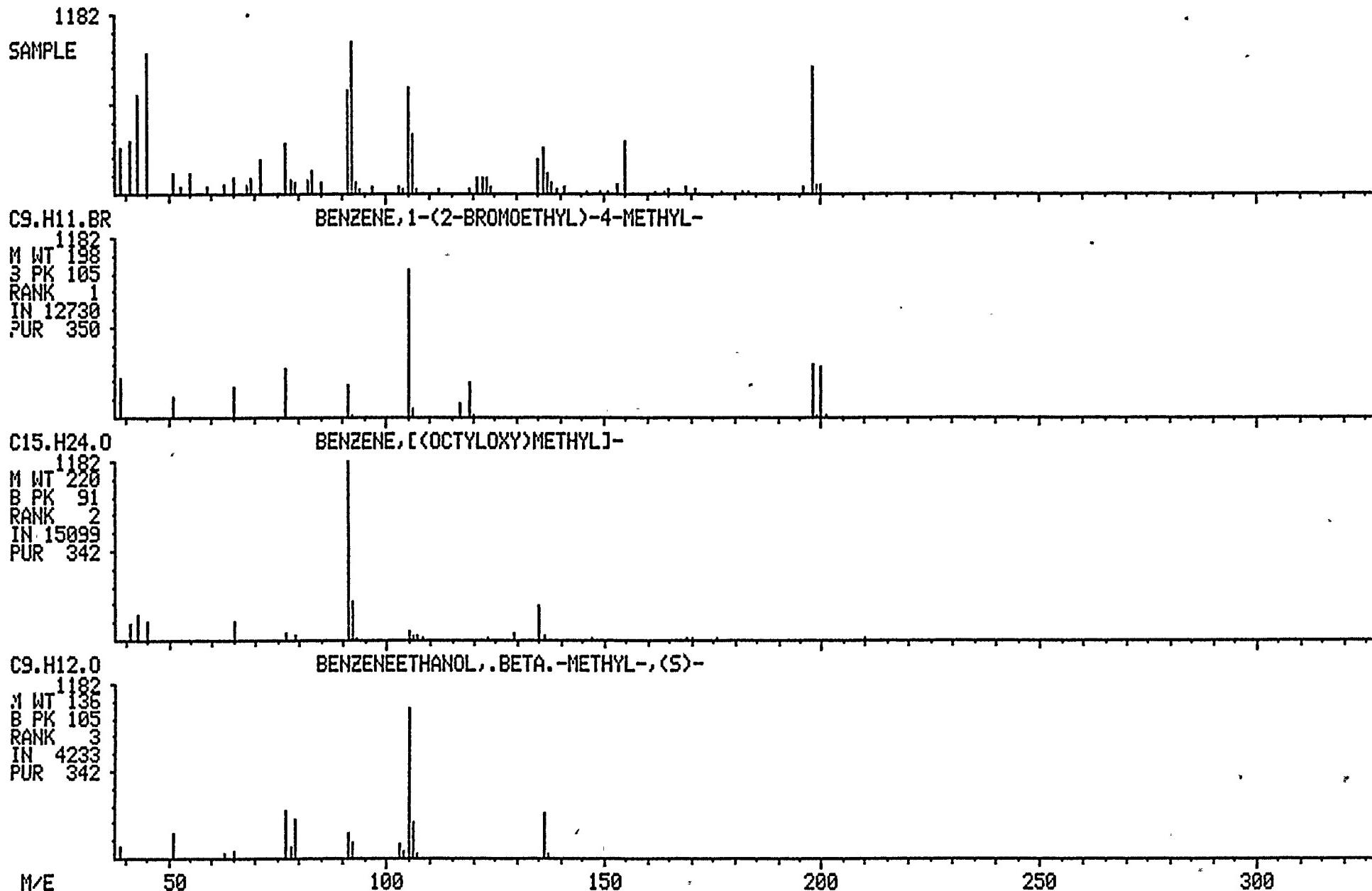
BASE M/E: 57
RIC: 571.



LIBRARY SEARCH
04/22/81 8:54:00 + 7:42
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 462
CALI: CAL331 # 1

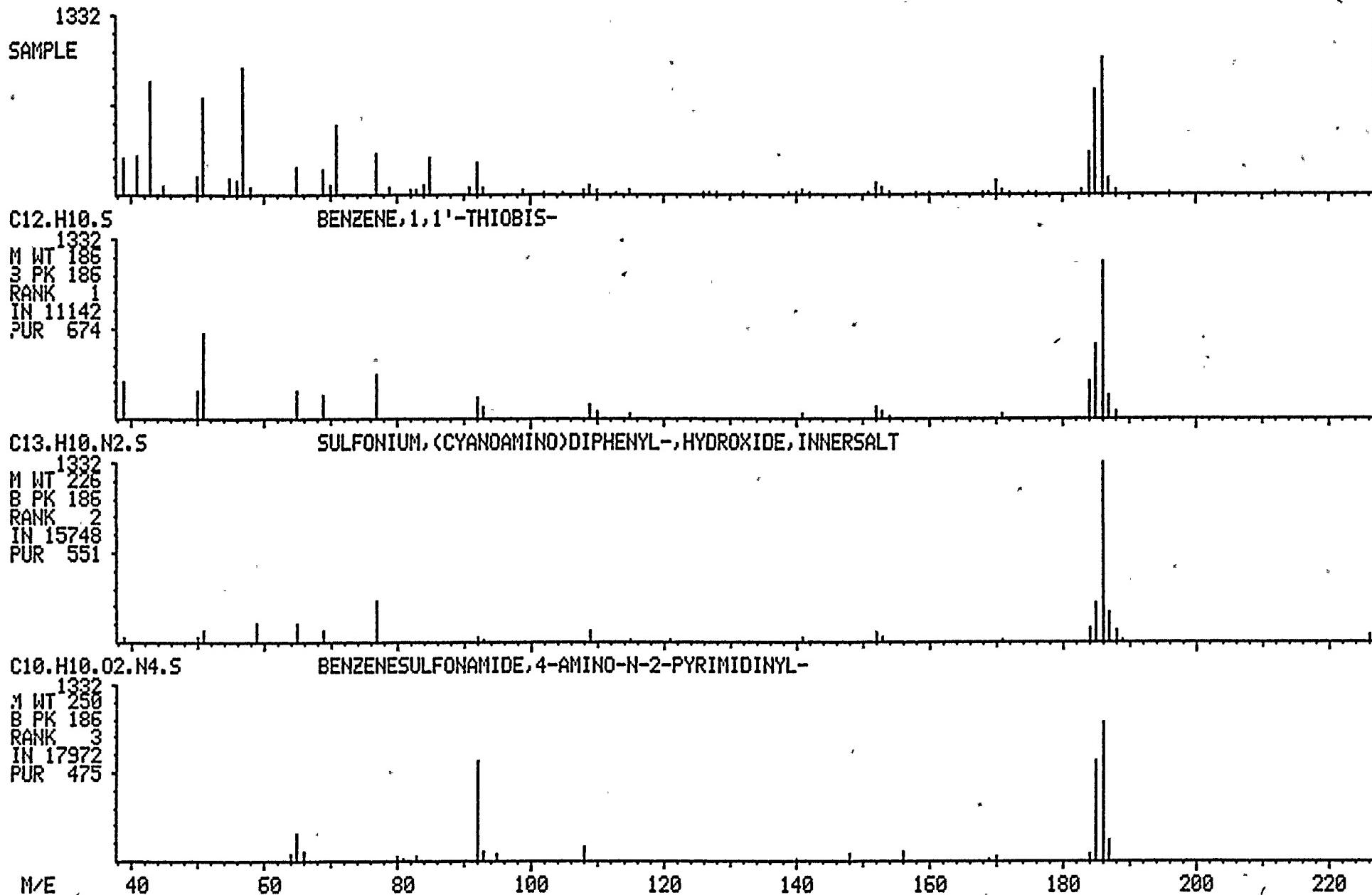
BASE M/E: 92
RIC: 4423.



LIBRARY SEARCH
04/22/81 8:54:00 + 7:58
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UVQ15R51 # 478
CALI: CAL331 # 1

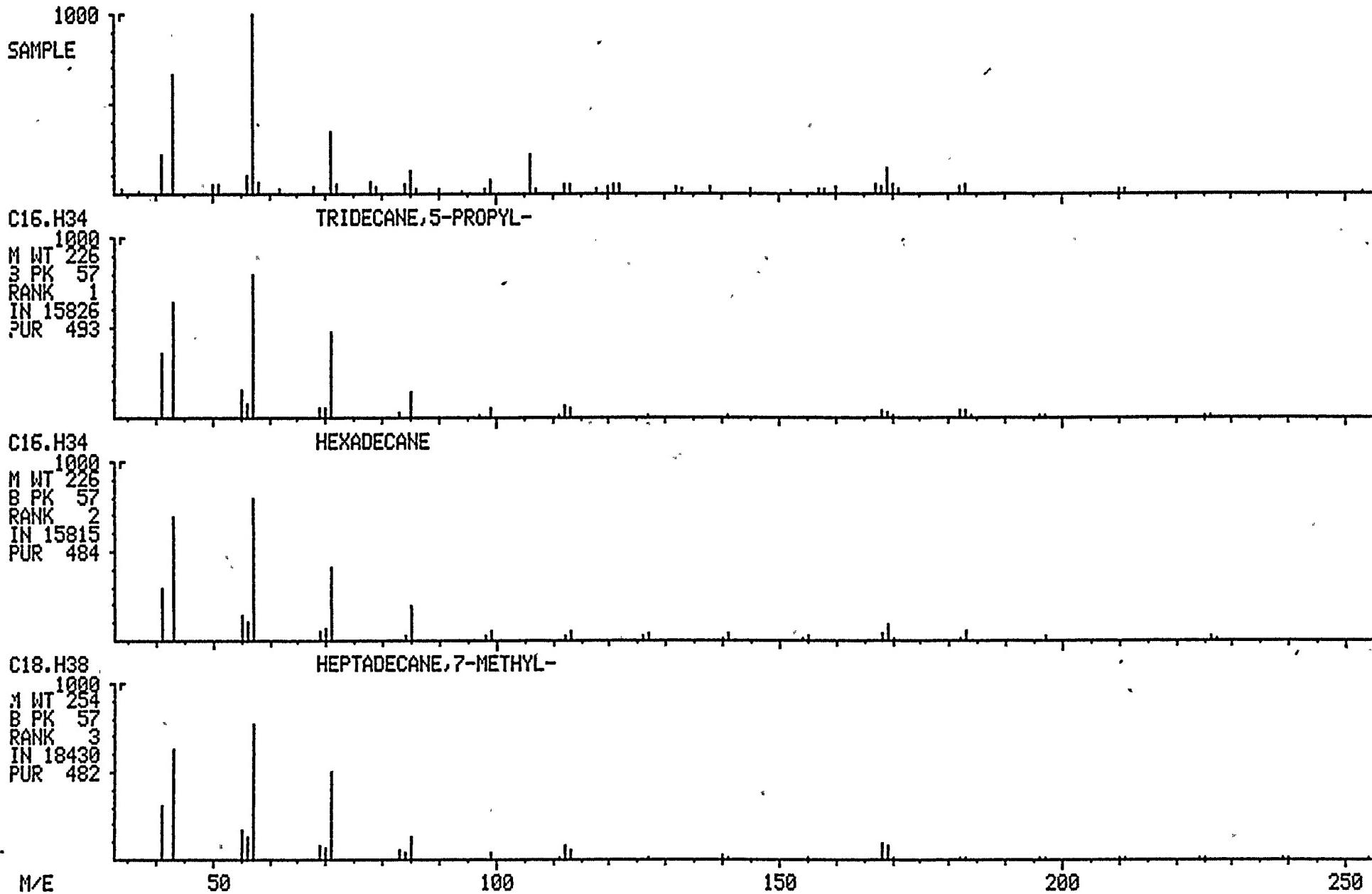
BASE M/E: 186
RIC: 11711.



LIBRARY SEARCH
04/22/81 8:54:00 + 8:19
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UYQ15R51 # 499
CALI: CAL331 # 1

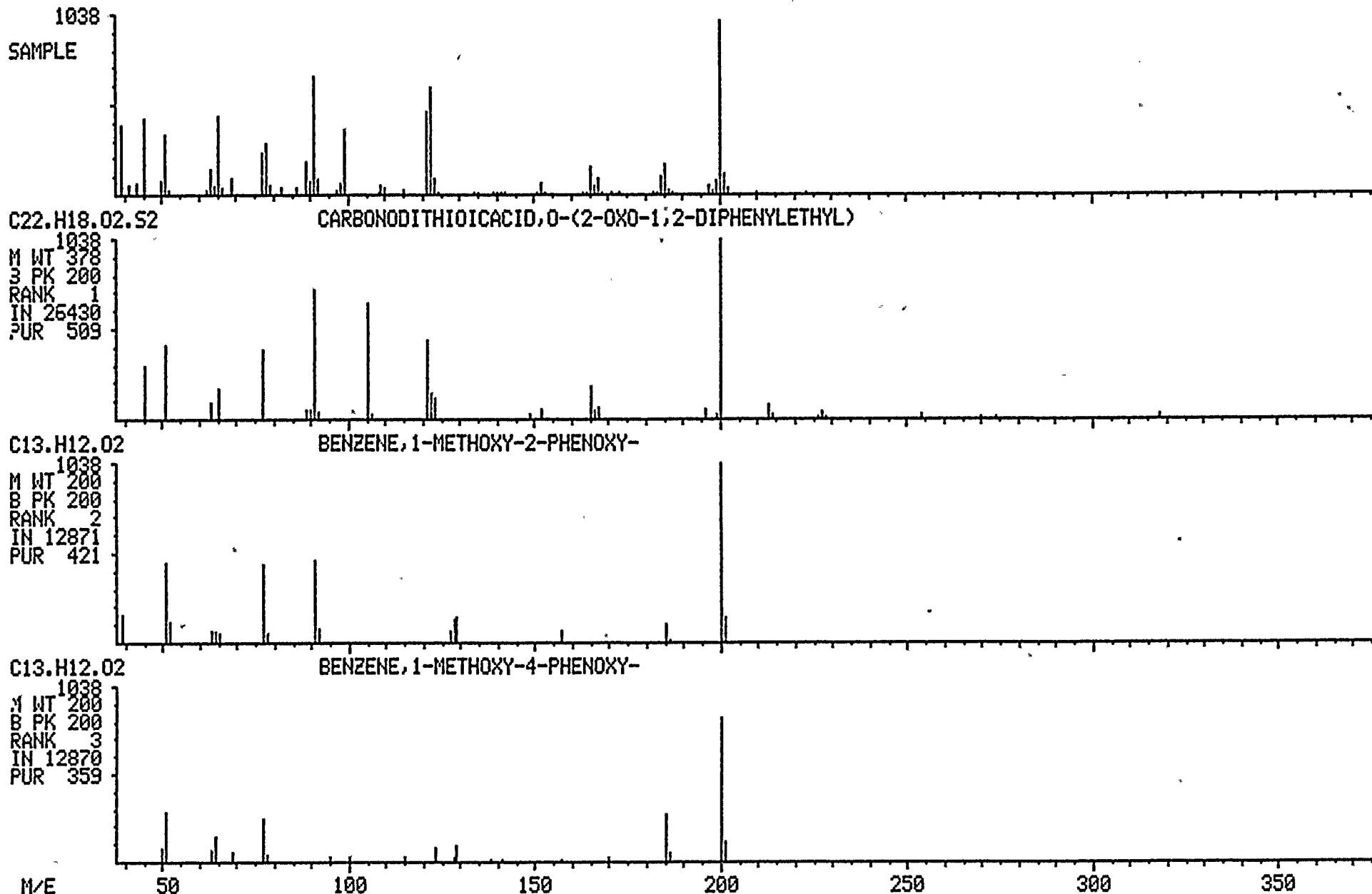
BASE M/E: 57
RIC: 1235.



LIBRARY SEARCH
04/22/81 8:54:00 + 8:26
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: VYQ1SR51 # 506
CALI: CAL331 # 1

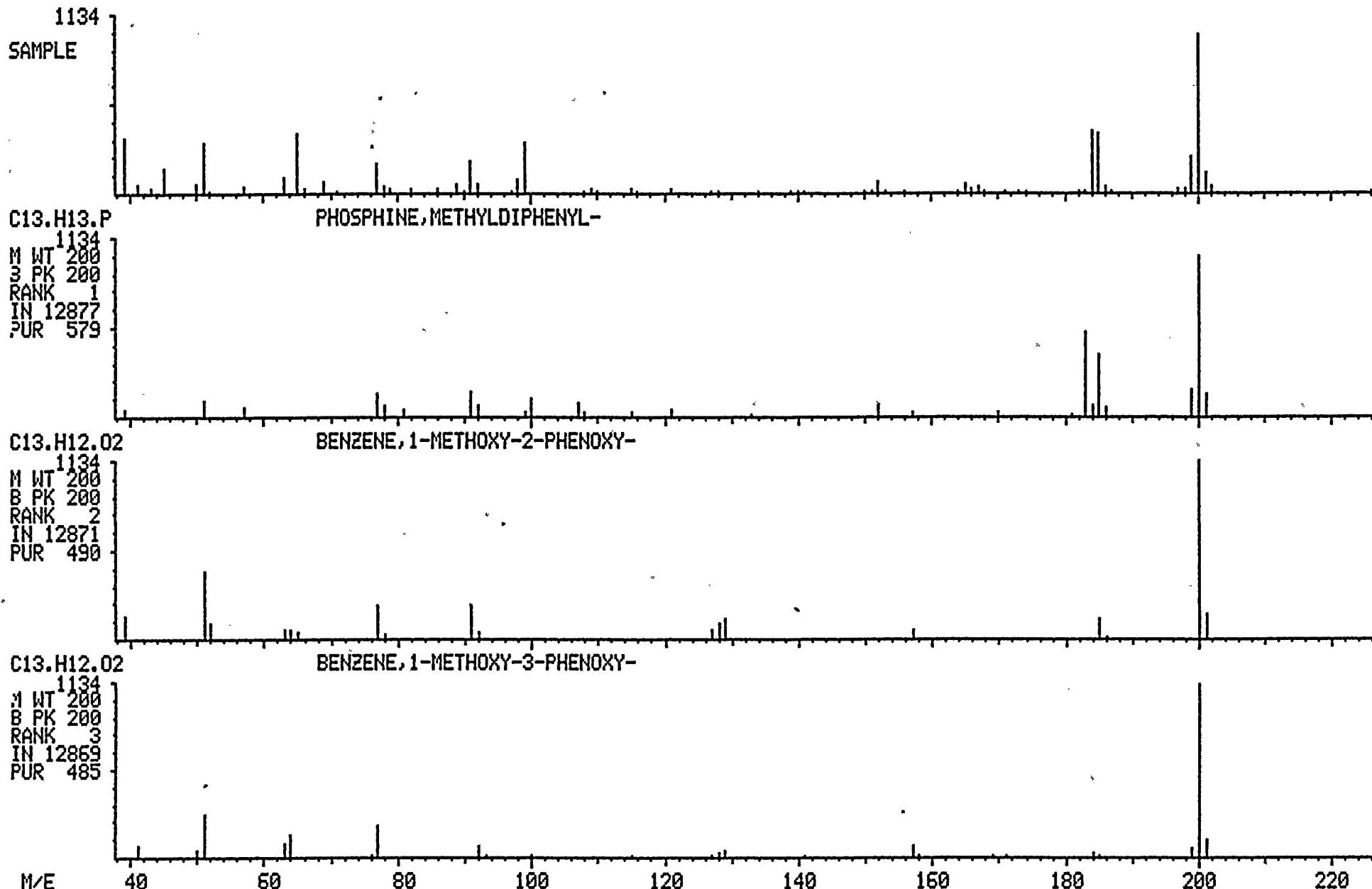
BASE M/E: 200
RIC: 15679.



LIBRARY SEARCH
04/22/81 8:54:00 + 8:33
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 513
CALI: CAL331 # 1

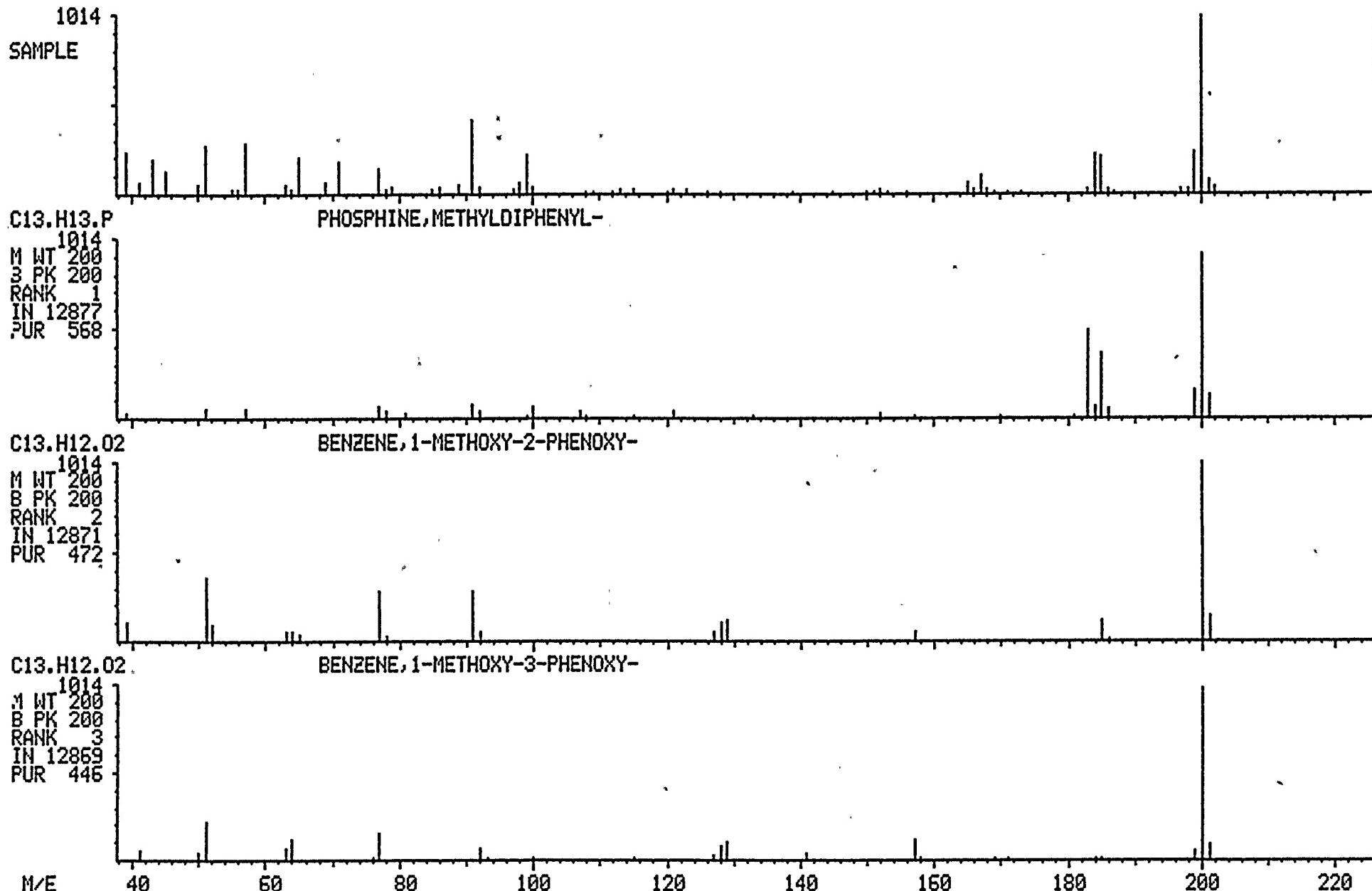
BASE M/E: 200
RIC: 13391.



LIBRARY SEARCH
04/22/81 8:54:00 + 8:42
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: VYQ15R51 # 522
CALI: CAL331 # 1

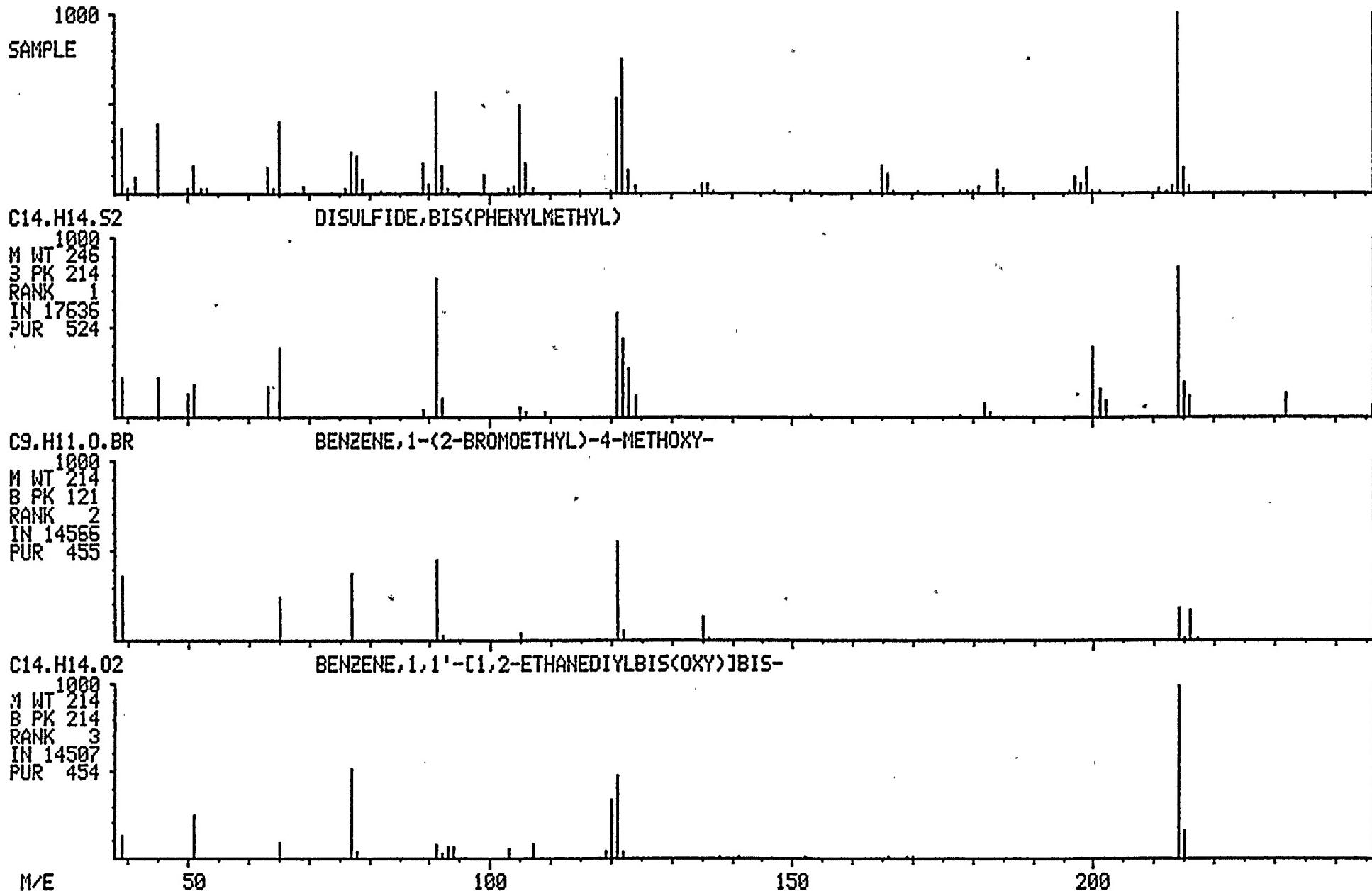
BASE M/E: 200
RIC: 6783.



LIBRARY SEARCH
04/22/81 8:54:00 + 9:00
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 540
CALI: CAL331 # 1

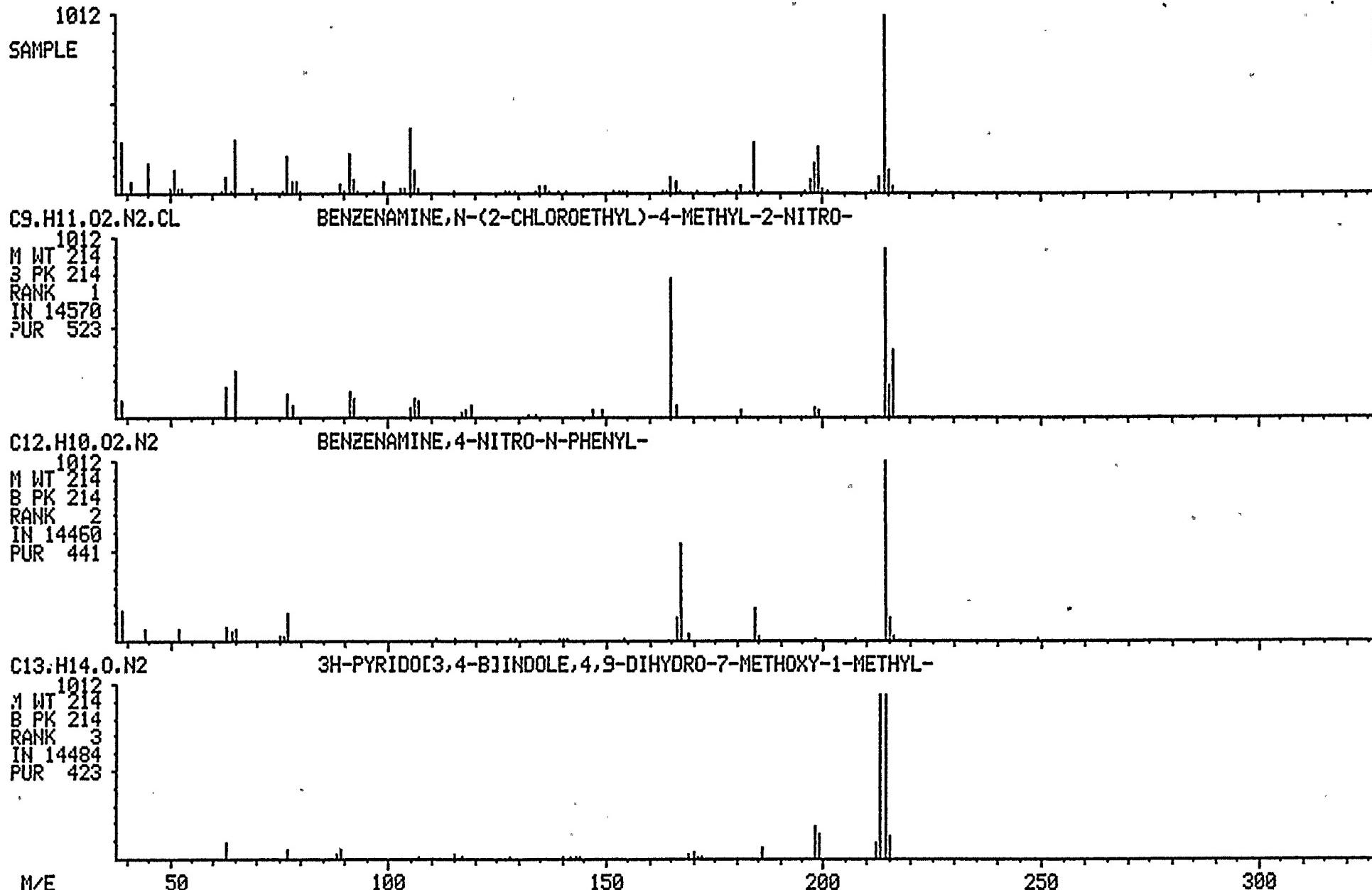
BASE M/E: 214
RIC: 25535.



LIBRARY SEARCH
04/22/81 8:54:00 + 9:09
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: VYQ15R51 # 549
CALI: CAL331 # 1

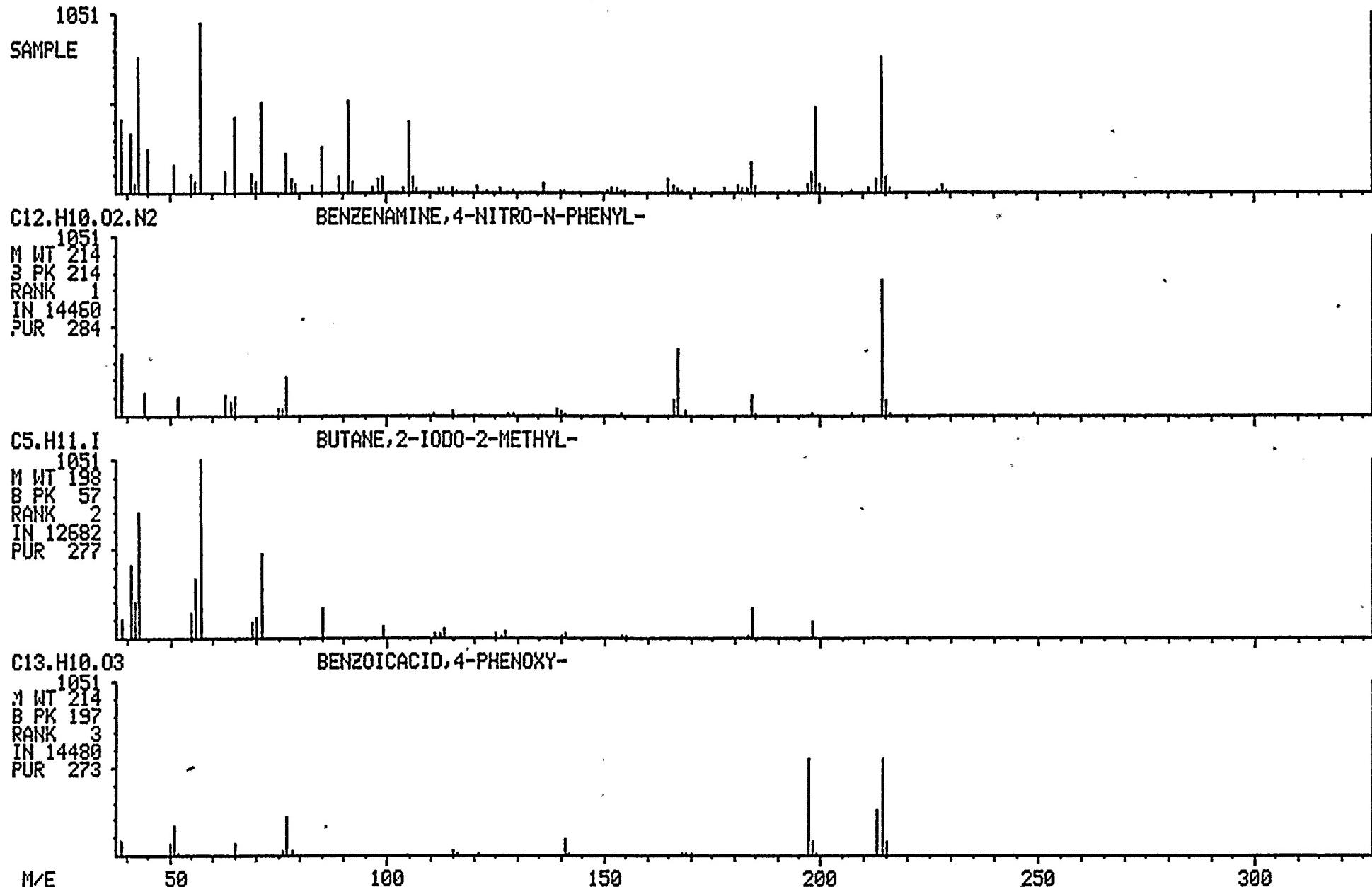
BASE M/E: 214
RIC: 10591.



LIBRARY SEARCH
04/22/81 8:54:00 + 9:19
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ1SR51 # 559
CALI: CAL331 # 1

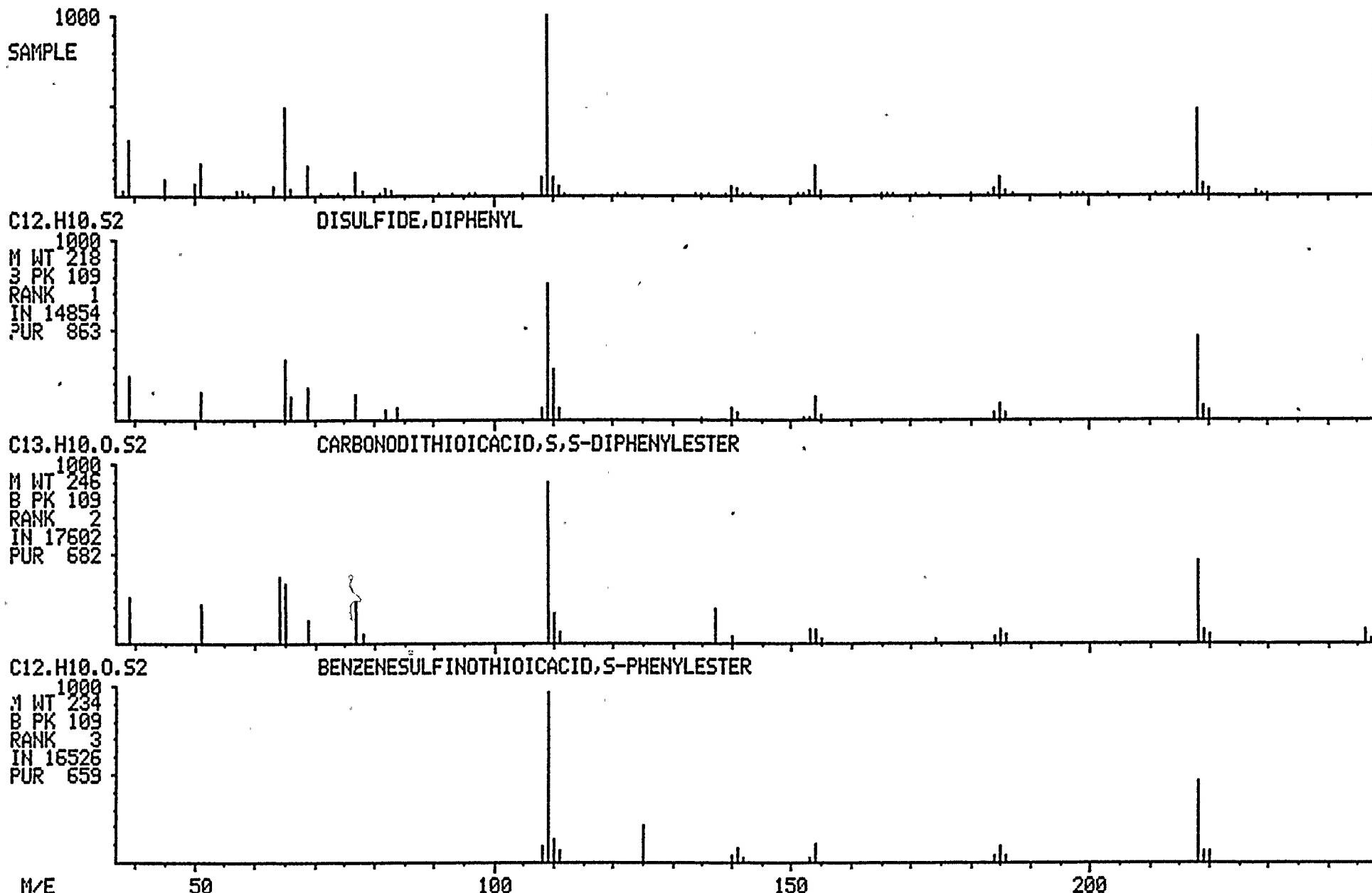
BASE M/E: 57
RIC: 7735.



LIBRARY SEARCH
04/22/81 8:54:00 + 9:32
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ1SR51 # 572
CALI: CAL331 # 1

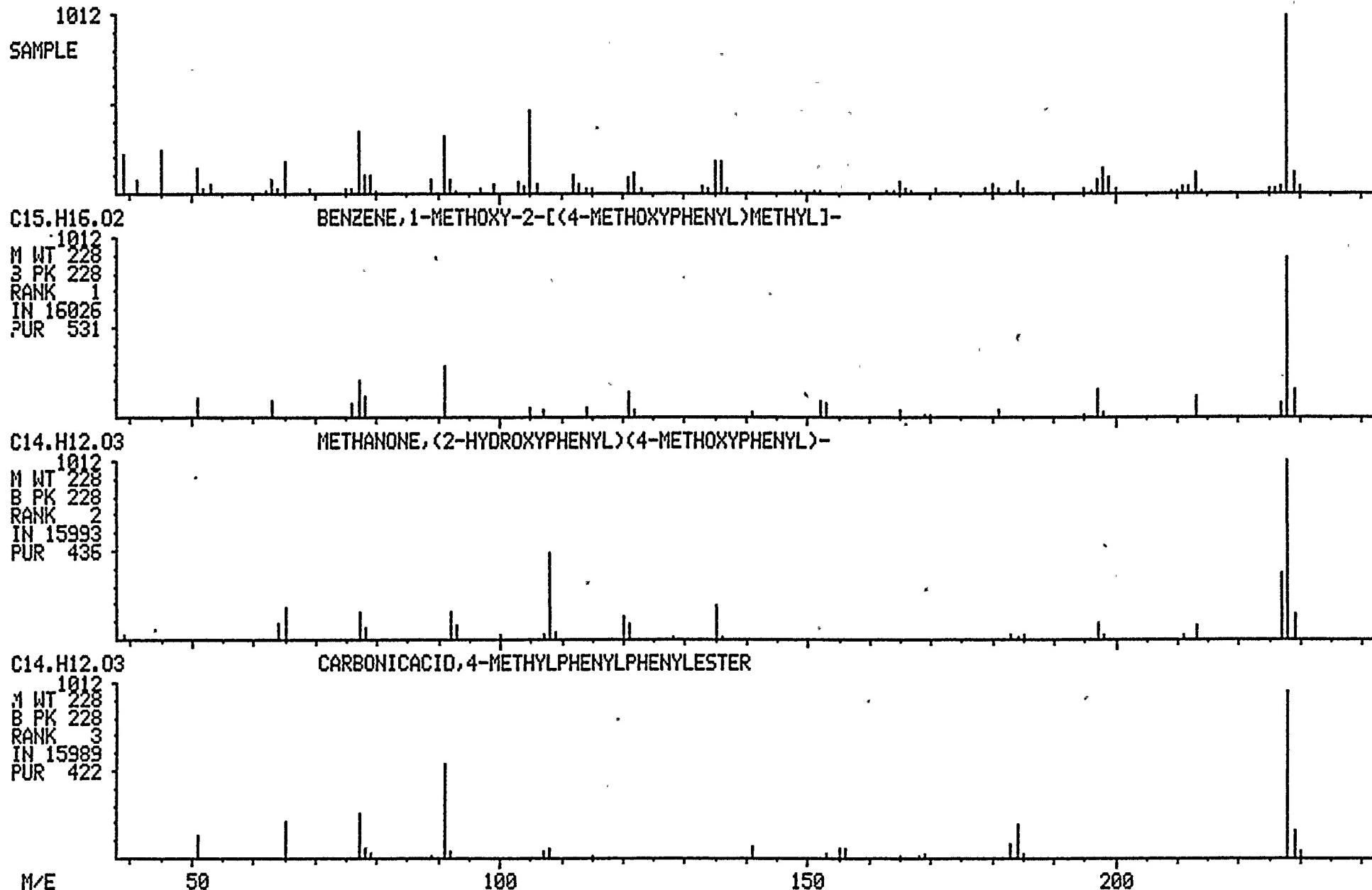
BASE M/E: 109
RIC: 197631.



LIBRARY SEARCH
04/22/81 8:54:00 + 9:44
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ15R51 # 584
CALI: CAL331 # 1

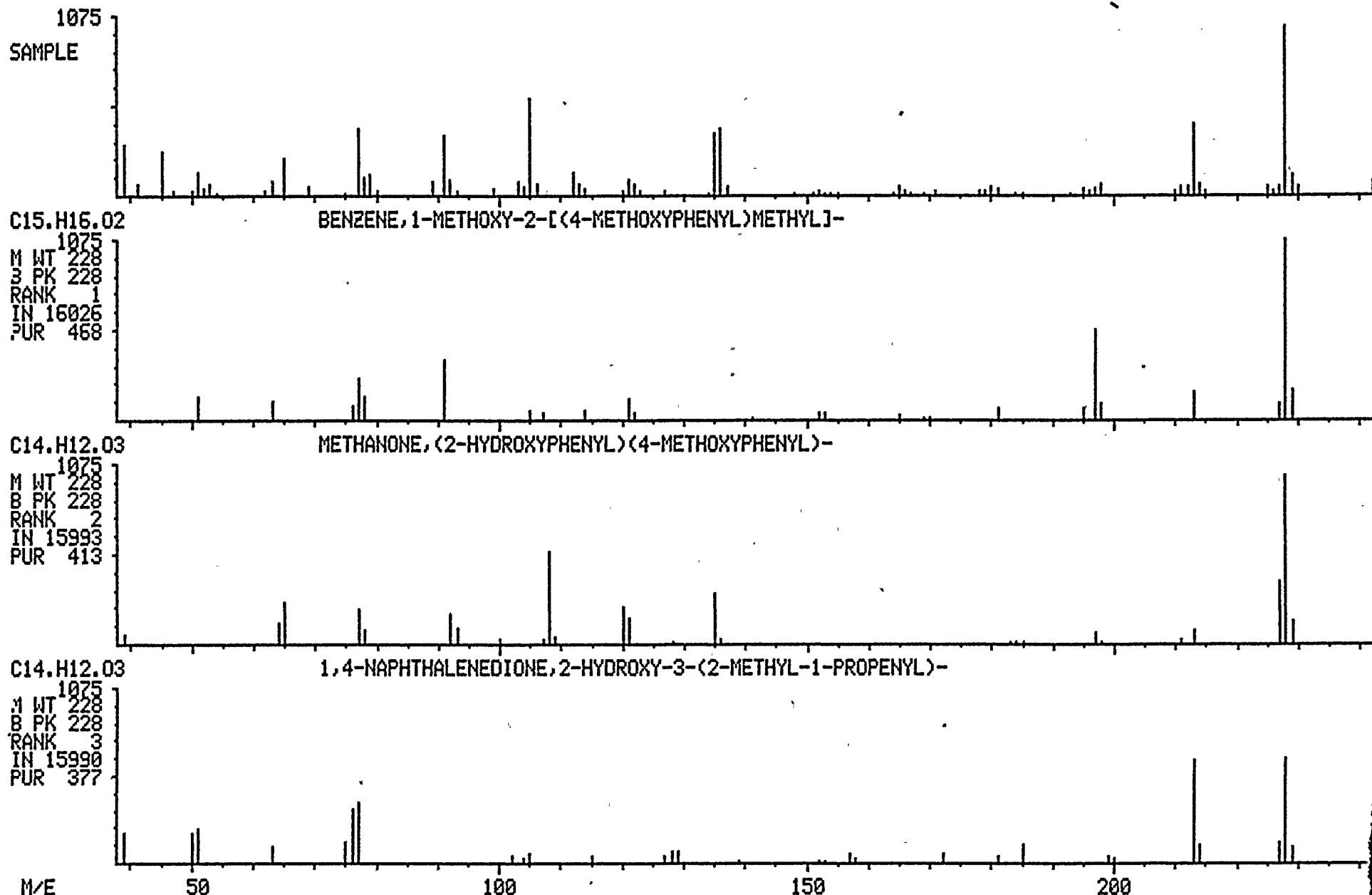
BASE M/E: 228
RIC: 6191.



LIBRARY SEARCH
04/22/81 8:54:00 + 9:57
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ1SR51 # 597
CALI: CAL331 # 1

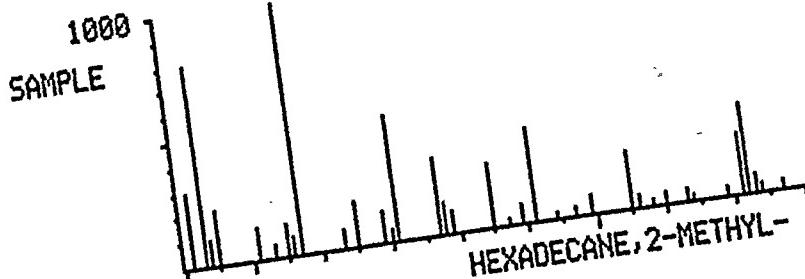
BASE M/E: 228
RIC: 3615.



DATA: UYQ15R51 # 601
CALI: CAL331 # 1

BASE M/E: 57
RIC: 3599.

LIBRARY SEARCH
04/22/81 8:54:00 + 10:01
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)



C17.H36
M WT 1000
B PK 57
RANK 1
IN 17151
PUR 327

C21.H44
M WT 1000
B PK 43
RANK 2
IN 21795
PUR 326

C20.H42
M WT 1000
B PK 57
RANK 3
IN 20706
PUR 325

PENTADECANE, 8-HEXYL-

HEXADECANE, 2,6,10,14-TETRAMETHYL-

M/E

50

100

150

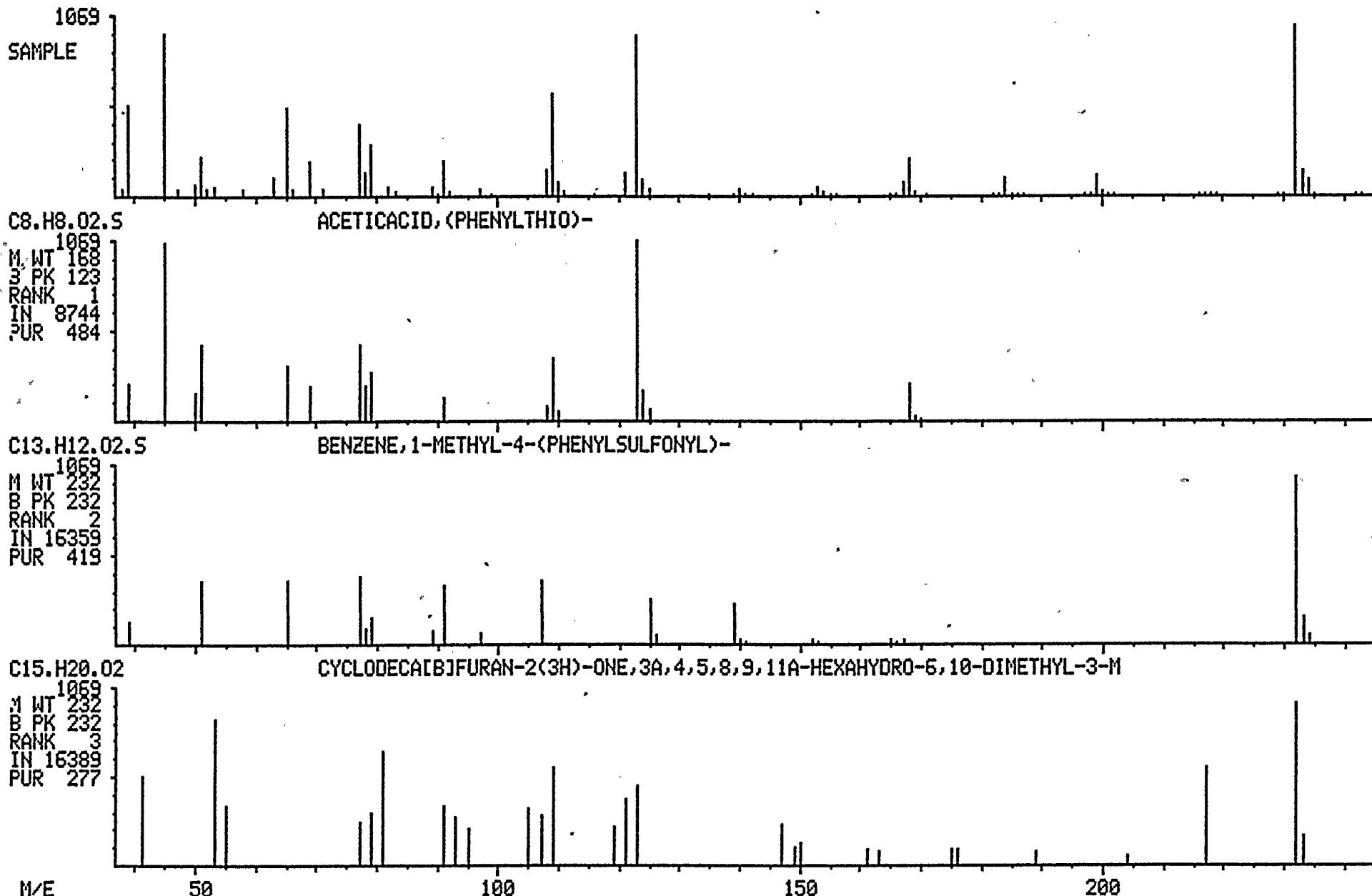
200

250

LIBRARY SEARCH
04/22/81 8:54:00 + 10:09
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UVQ15R51 # 609
CALI: CAL331 # 1

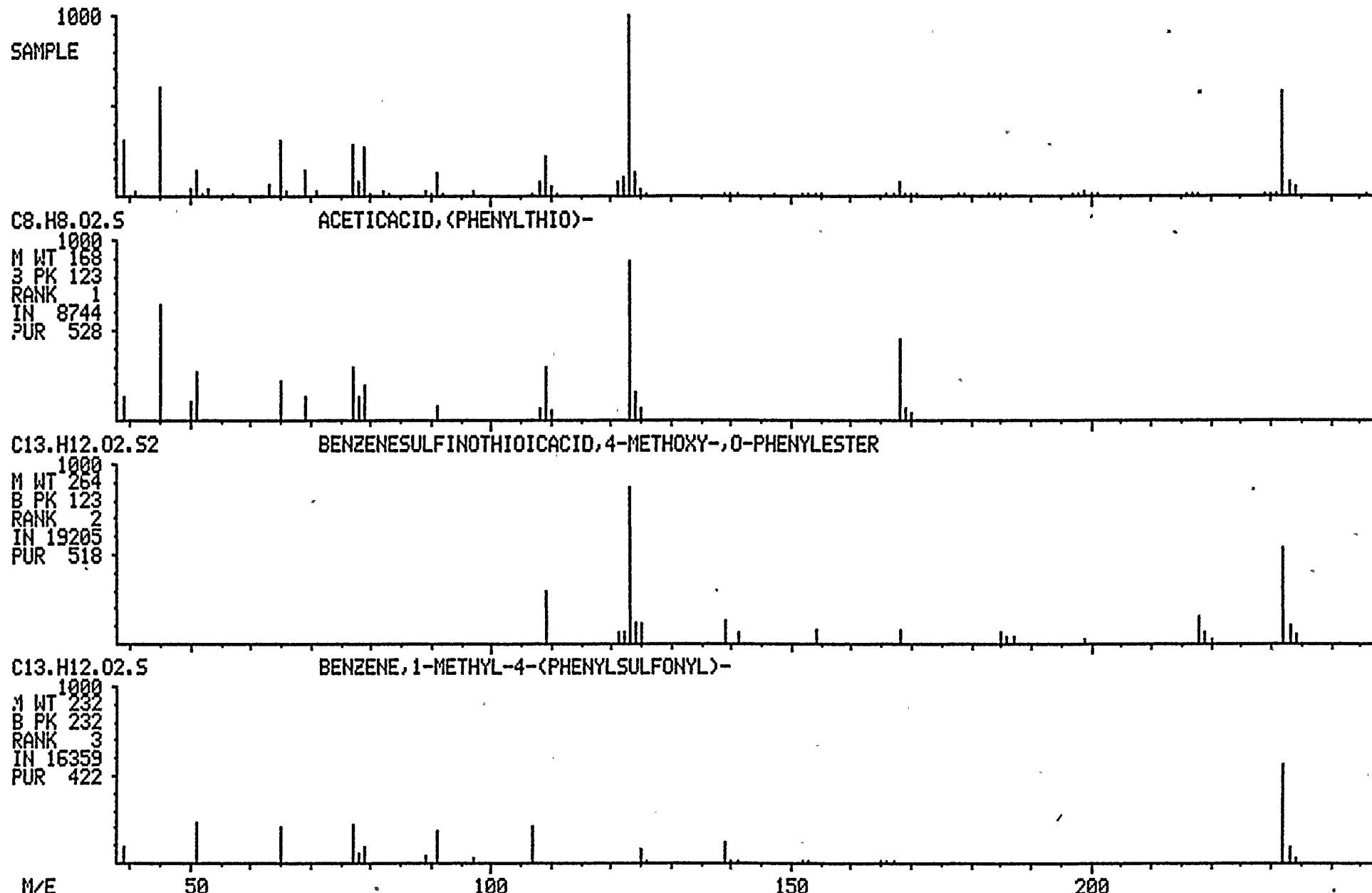
BASE M/E: 232
RIC: 119039.



LIBRARY SEARCH
04/22/81 8:54:00 + 10:20
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 620
CALI: CAL331 # 1

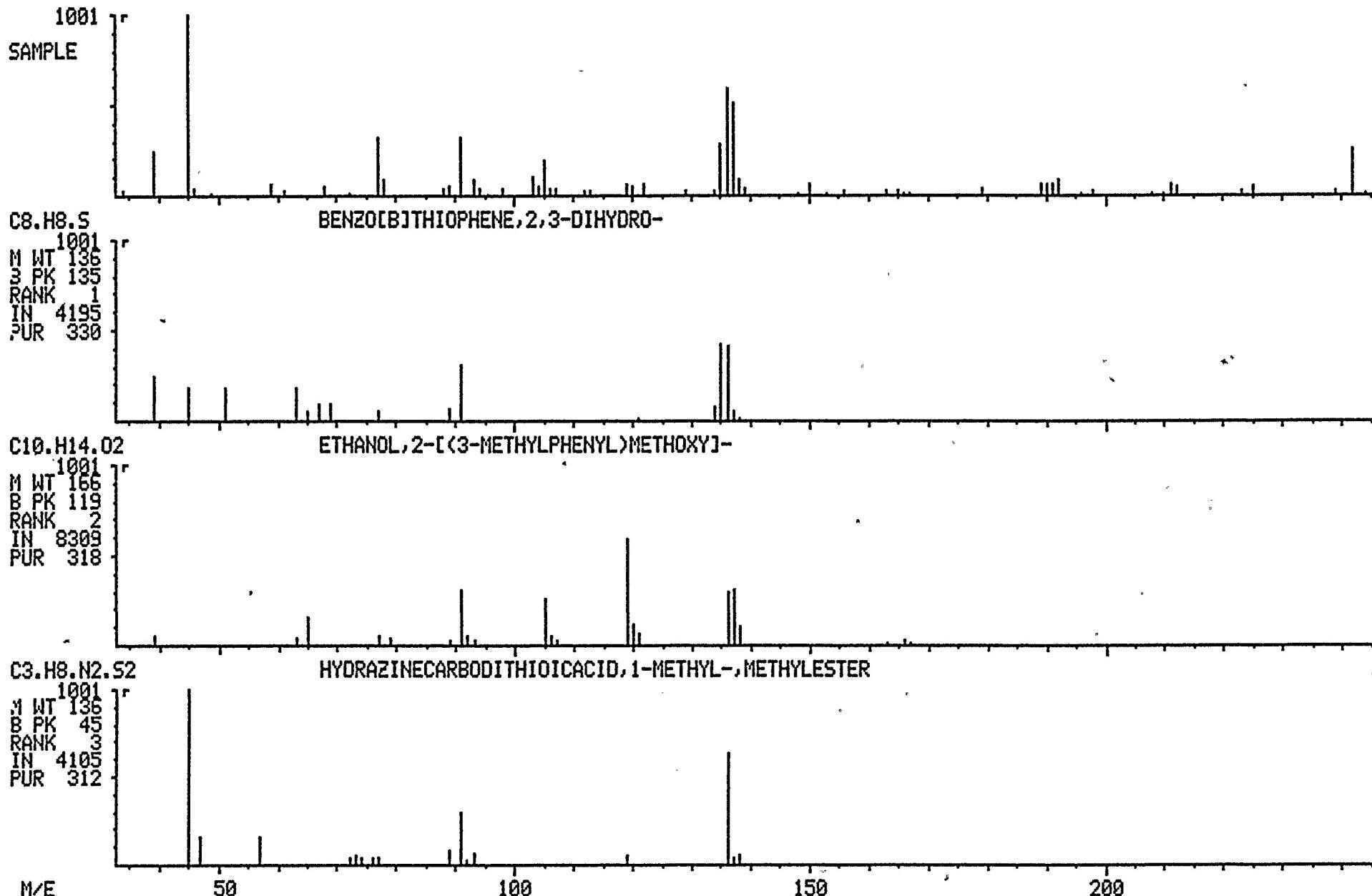
BASE M/E: 123
RIC: 31487.



LIBRARY SEARCH
04/22/81 8:54:00 + 10:29
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UVQ15R51 # 629
CALI: CAL331 # 1

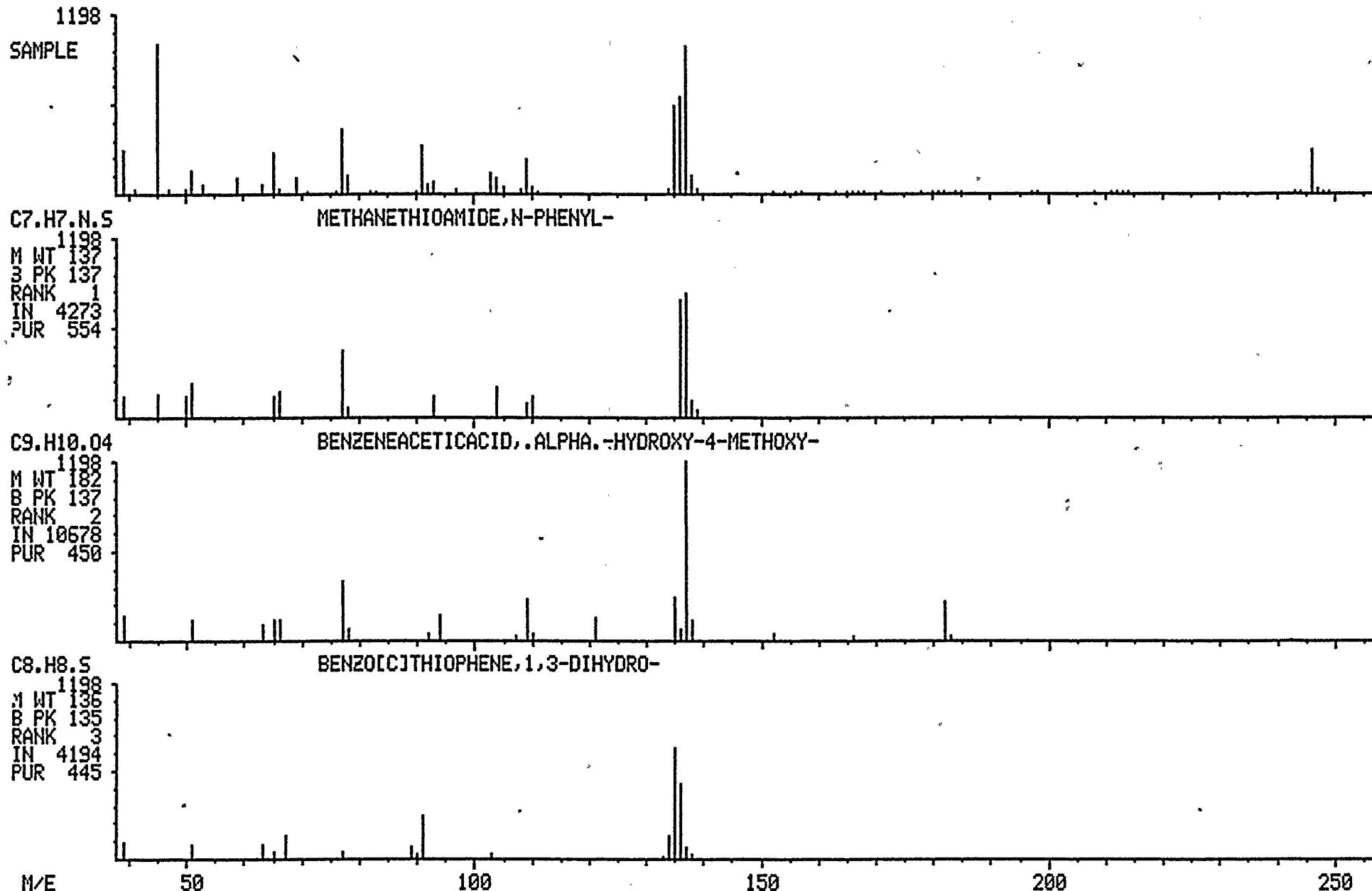
BASE M/E: 45
RIC: 1495.



LIBRARY SEARCH
04/22/81 8:54:00 + 10:37
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 637
CALI: CAL331 # 1

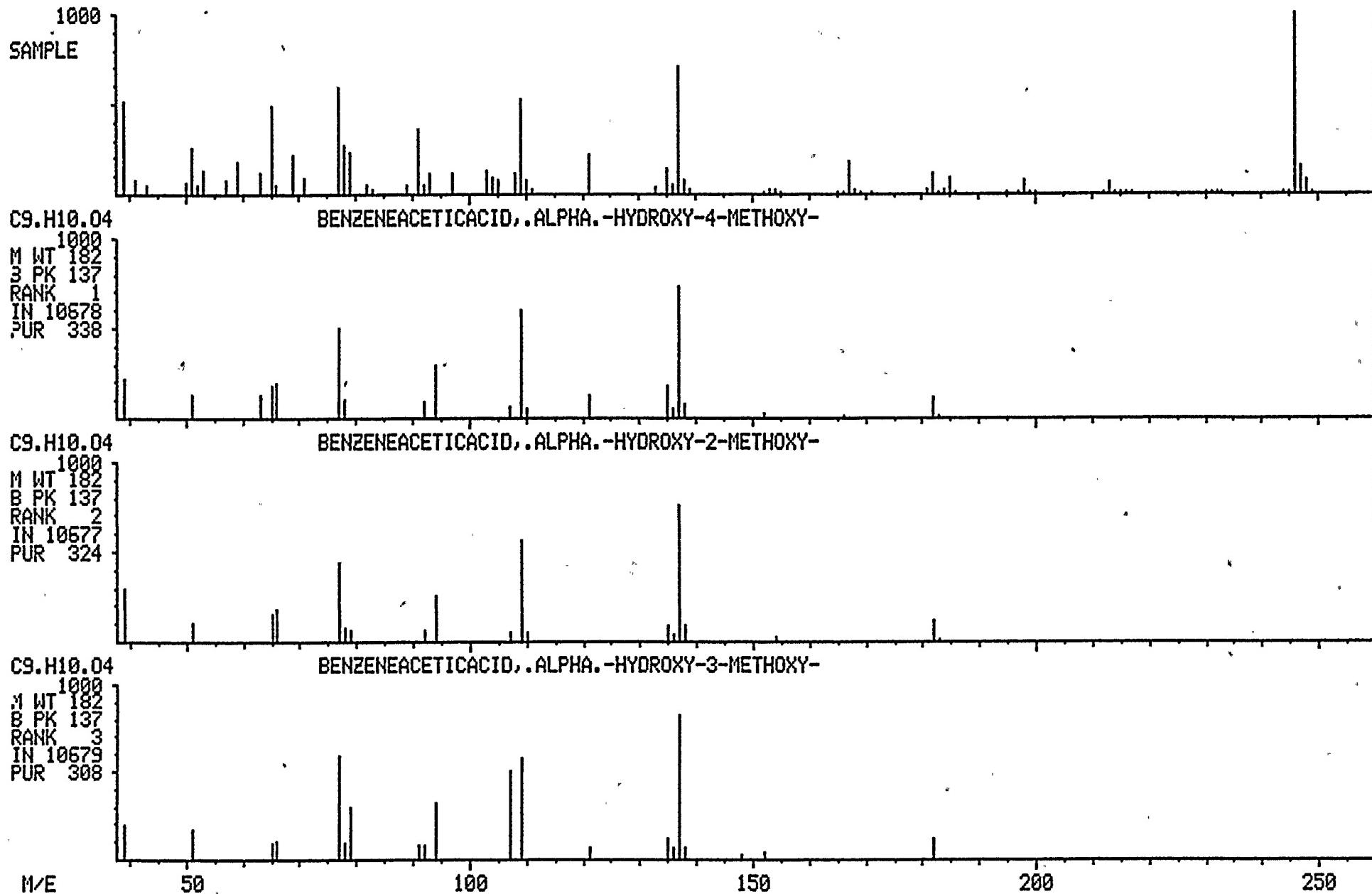
BASE M/E: 45
RIC: 24447.



LIBRARY SEARCH
04/22/81 8:54:00 + 10:45
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: VYQ15R51 # 645
CALI: CAL331 # 1

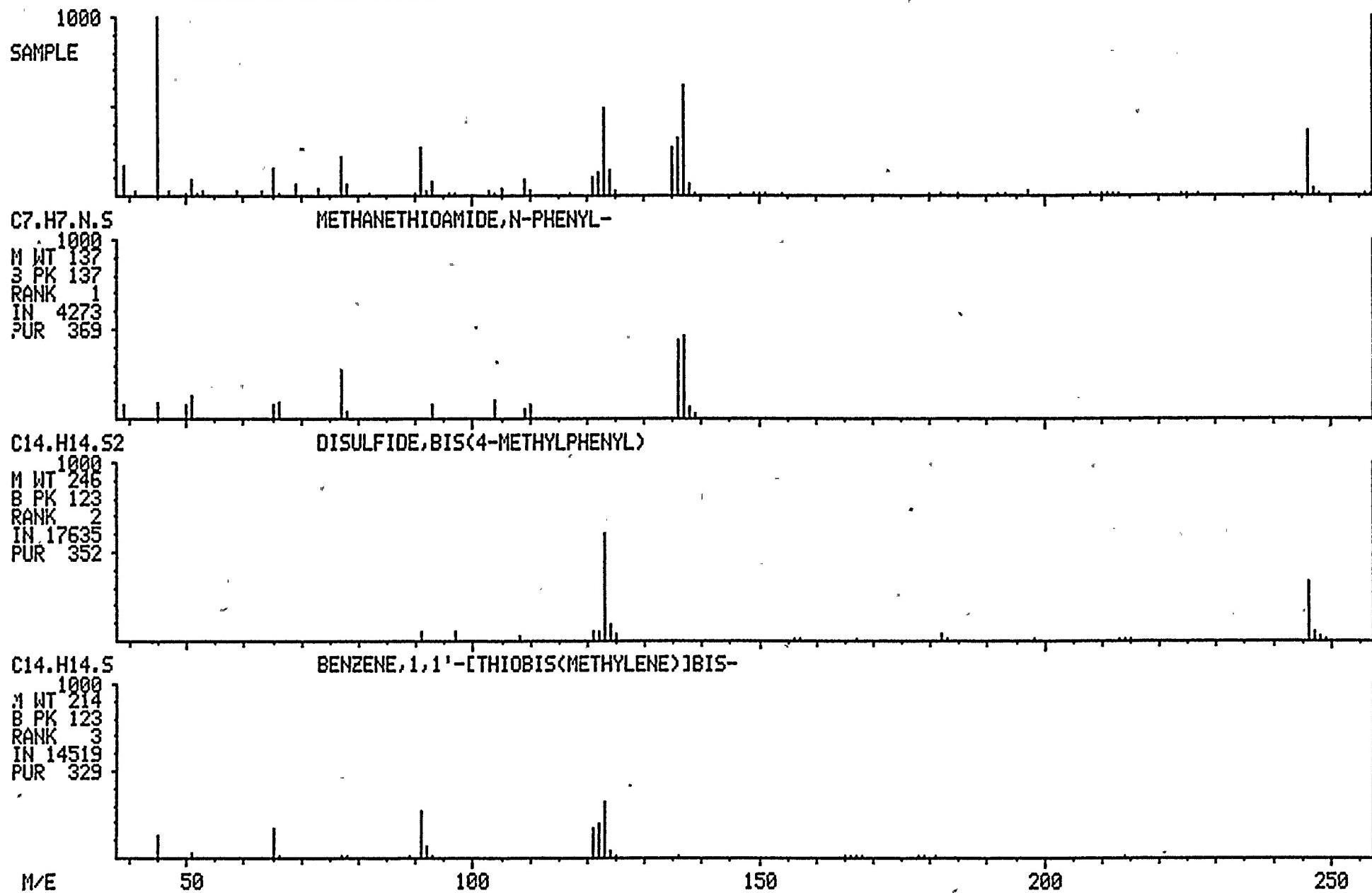
BASE M/E: 246
RIC: 35071.



LIBRARY SEARCH
04/22/81 8:54:00 + 10:52
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: VYQ15R51 # 652
CALI: CAL331 # 1

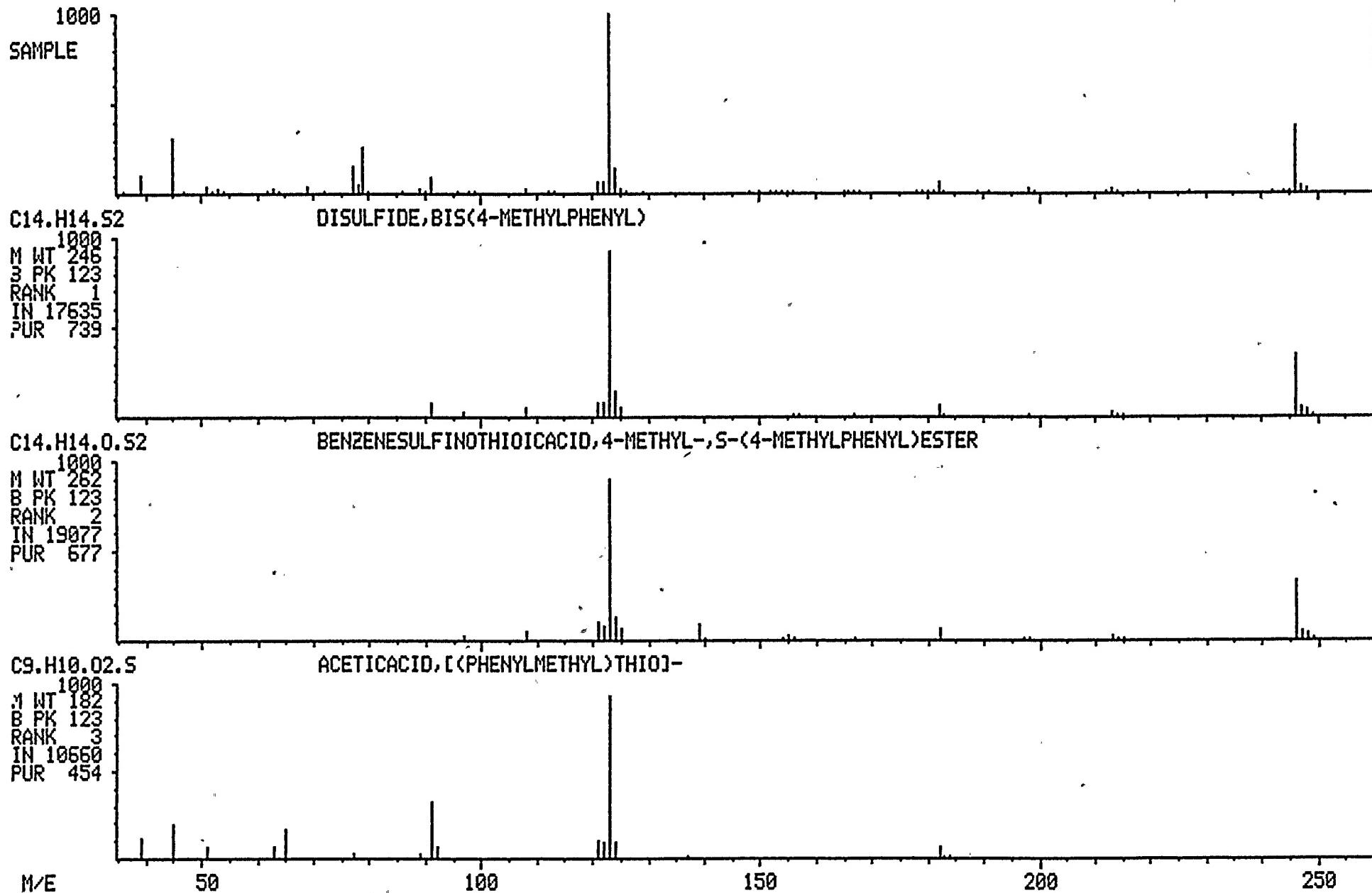
BASE M/E: 45
RIC: 9439.



LIBRARY SEARCH
04/22/81 8:54:00 + 10:57
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

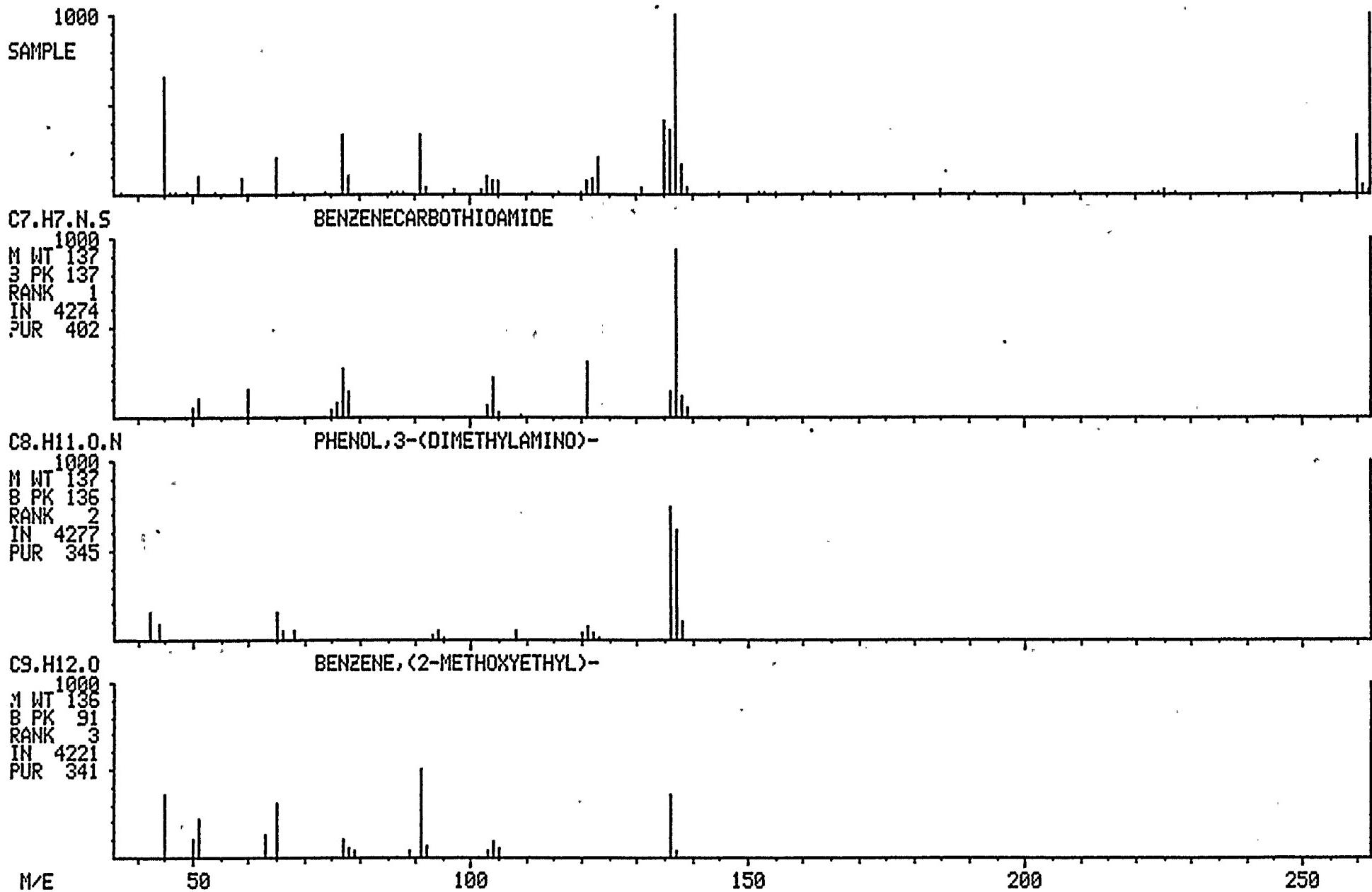
DATA: UYQ15R51 # 657
CALI: CAL331 # 1

BASE M/E: 123
RIC: 6791.



LIBRARY SEARCH
04/22/81 8:54:00 + 11:03
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

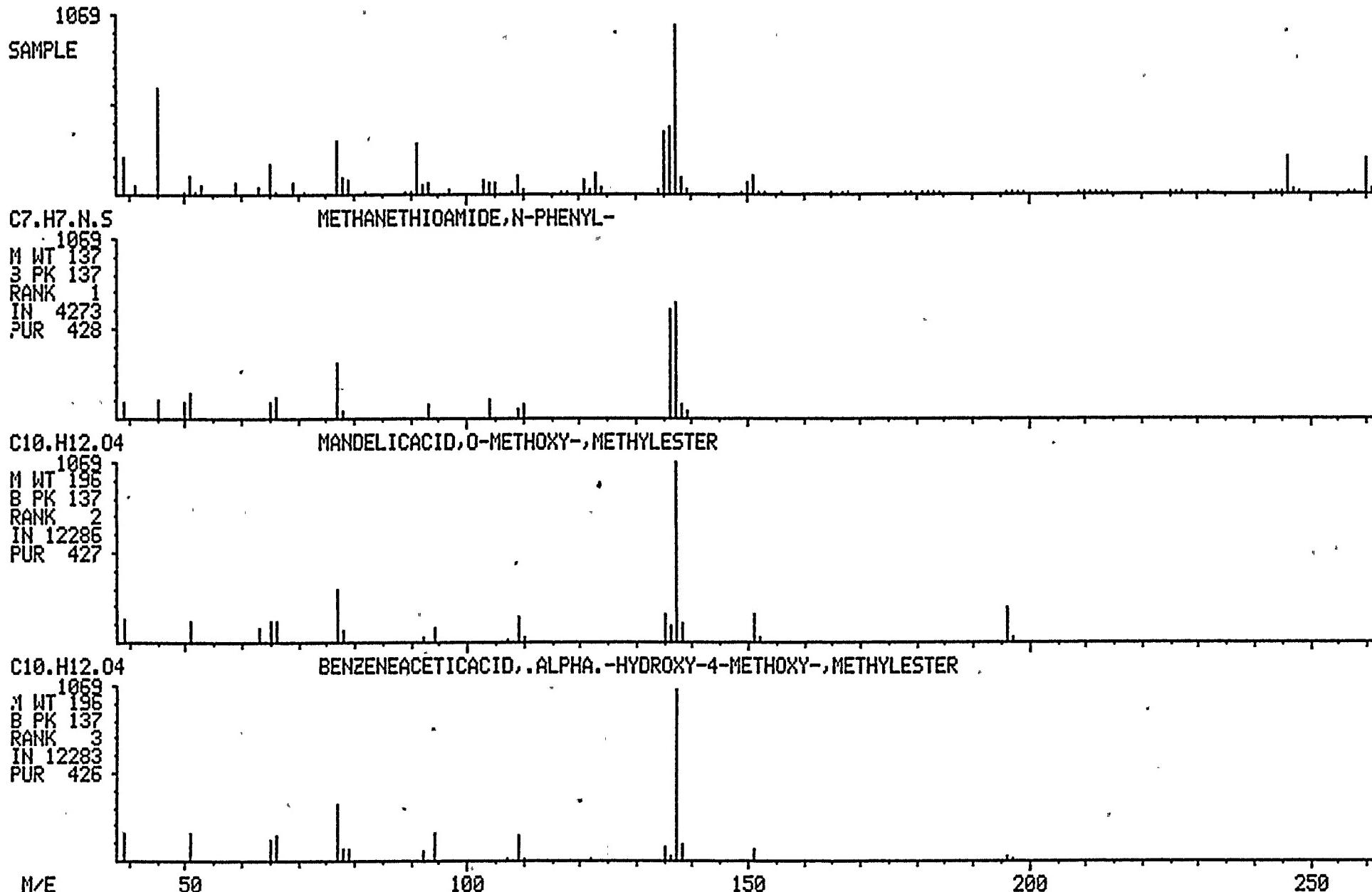
DATA: UYQ15R51 # 663 BASE M/E: 137
CALI: CAL331 # 1 RIC: 3619.



LIBRARY SEARCH
04/22/81 8:54:00 + 11:12
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 672
CALI: CAL331 # 1

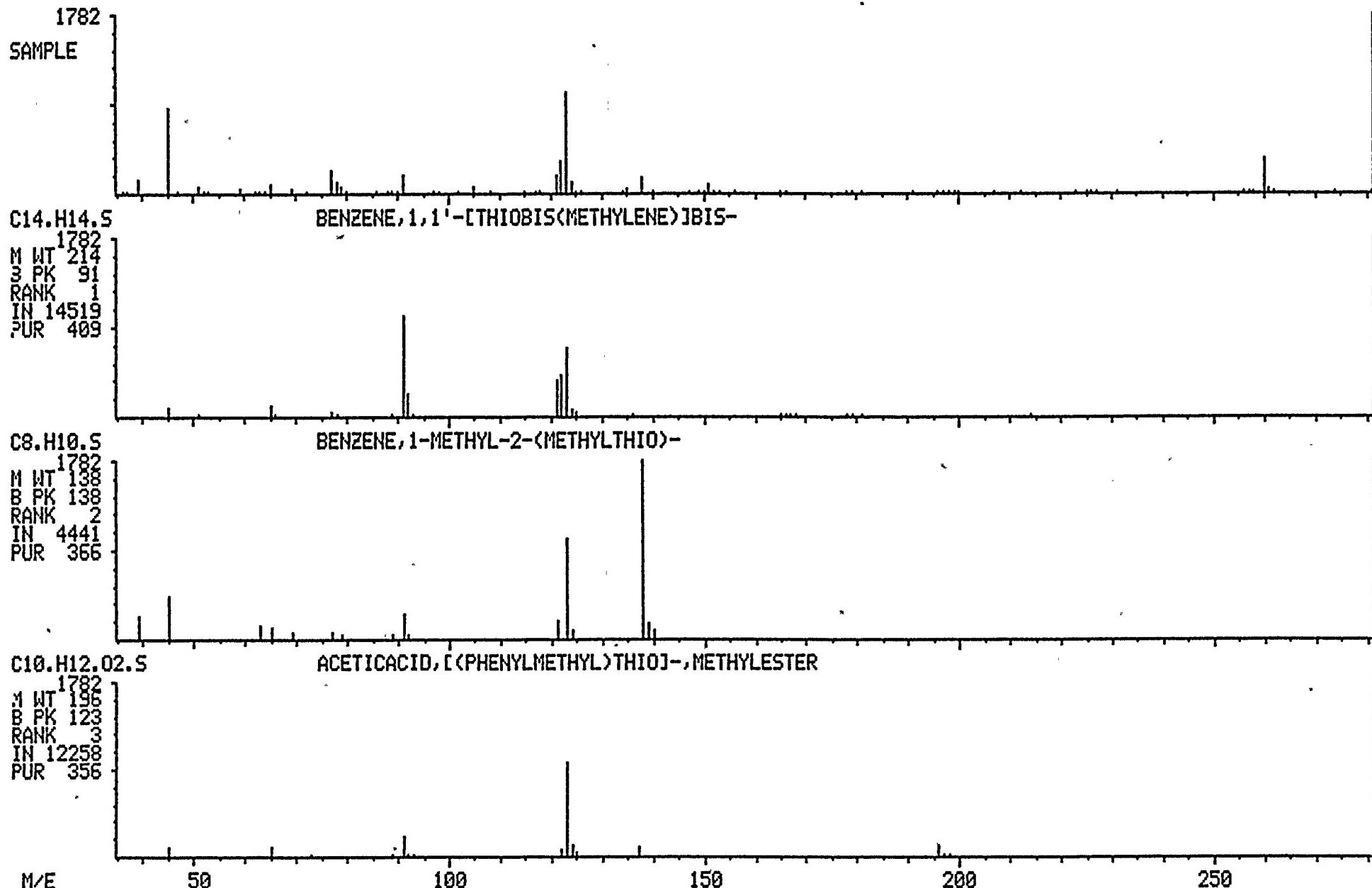
BASE M/E: 137
RIC: 13343.



LIBRARY SEARCH
04/22/81 8:54:00 + 11:18
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N 0T)

DATA: UYQ15R51 # 578
CALI: CAL331 # 1

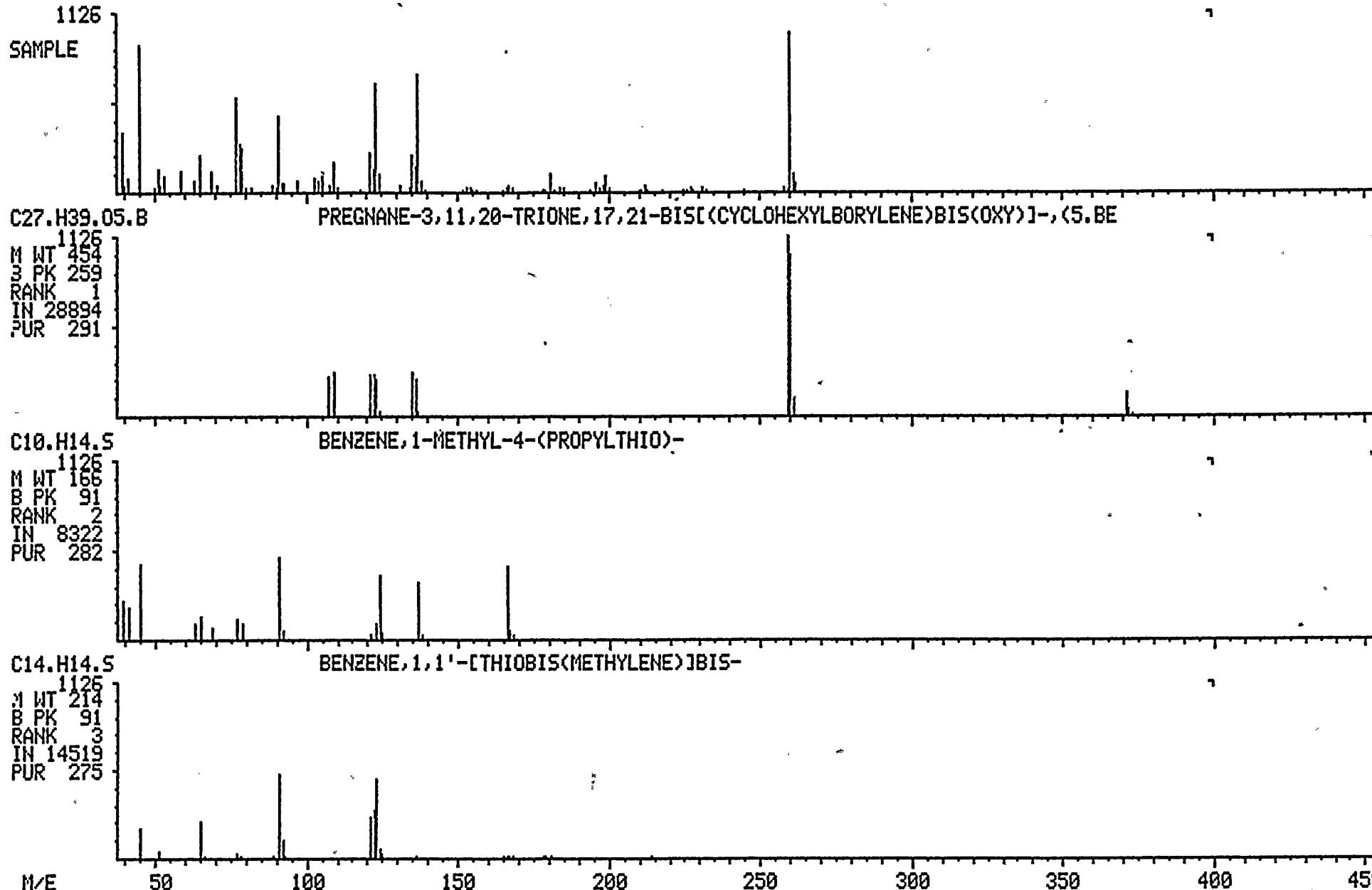
BASE M/E: 123
RIC: 6743.



LIBRARY SEARCH
04/22/81 8:54:00 + 11:22
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: VYQ15R51 # 682
CALI: CAL331 # 1

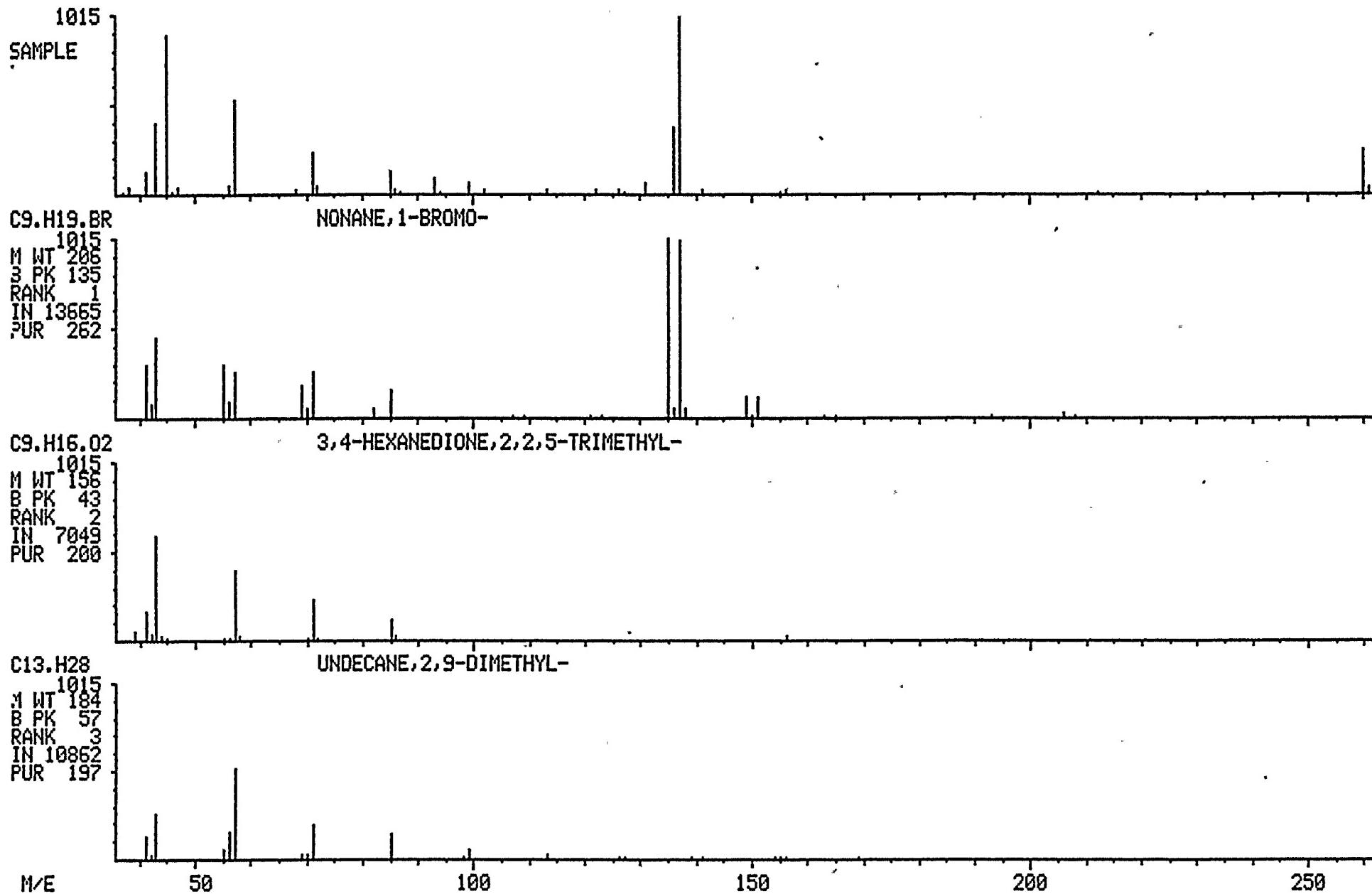
BASE M/E: 260
RIC: 9087.



LIBRARY SEARCH
04/22/81 8:54:00 + 11:28
SAMPLE: Q1 SR51
ENHANCED (S 15B 2N OT)

DATA: VYQ15R51 # 688
CALI: CAL331 # 1

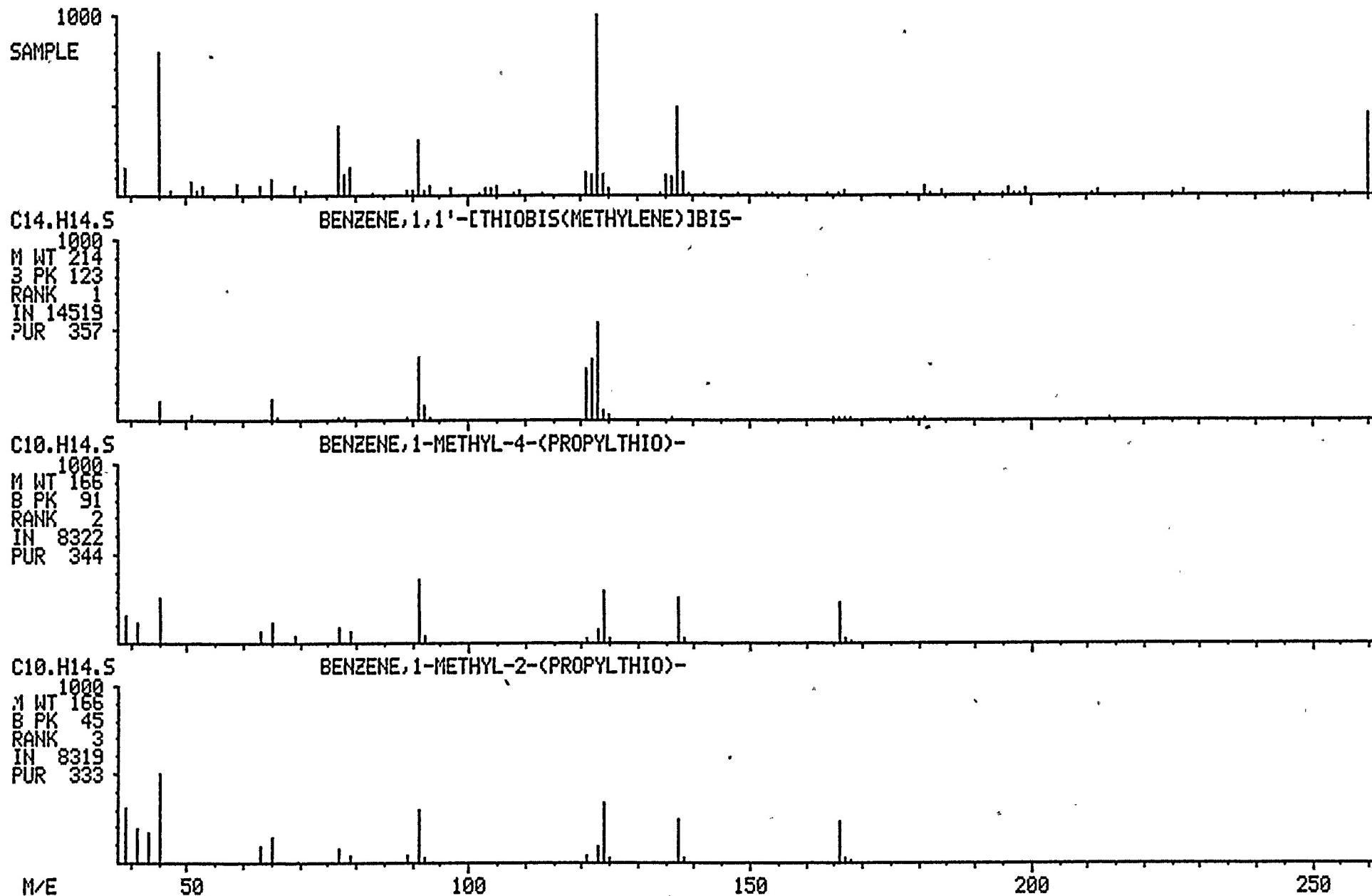
BASE M/E: 137
RIC: 1195.



LIBRARY SEARCH
04/22/81 8:54:00 + 11:34
SAMPLE: Q1 SR51
ENHANCED (S 158 2N 0T)

DATA: UVQ15R51 # 694
CALI: CAL331 # 1

BASE M/E: 123
RIC: 3507.



RIC
05/14/81 10:06:00
SAMPLE: 04

SAMPLE: Q4
PAUSE: 0

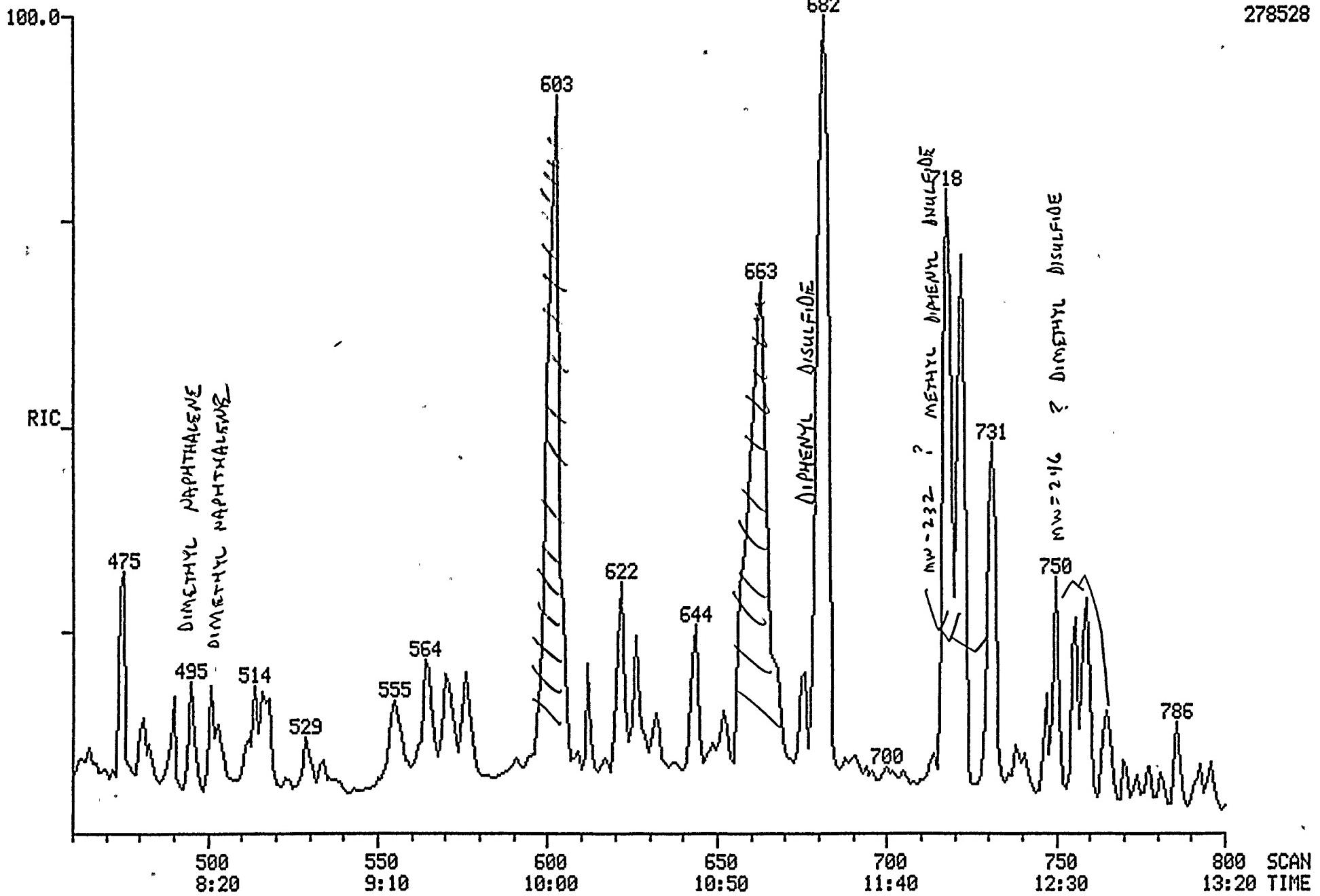
RANGE: G 1, 944

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DATA: SRS104 #1

DATA: 3901&T #1
CAT #: CAT 331 #1

SCANS 460 TO 800



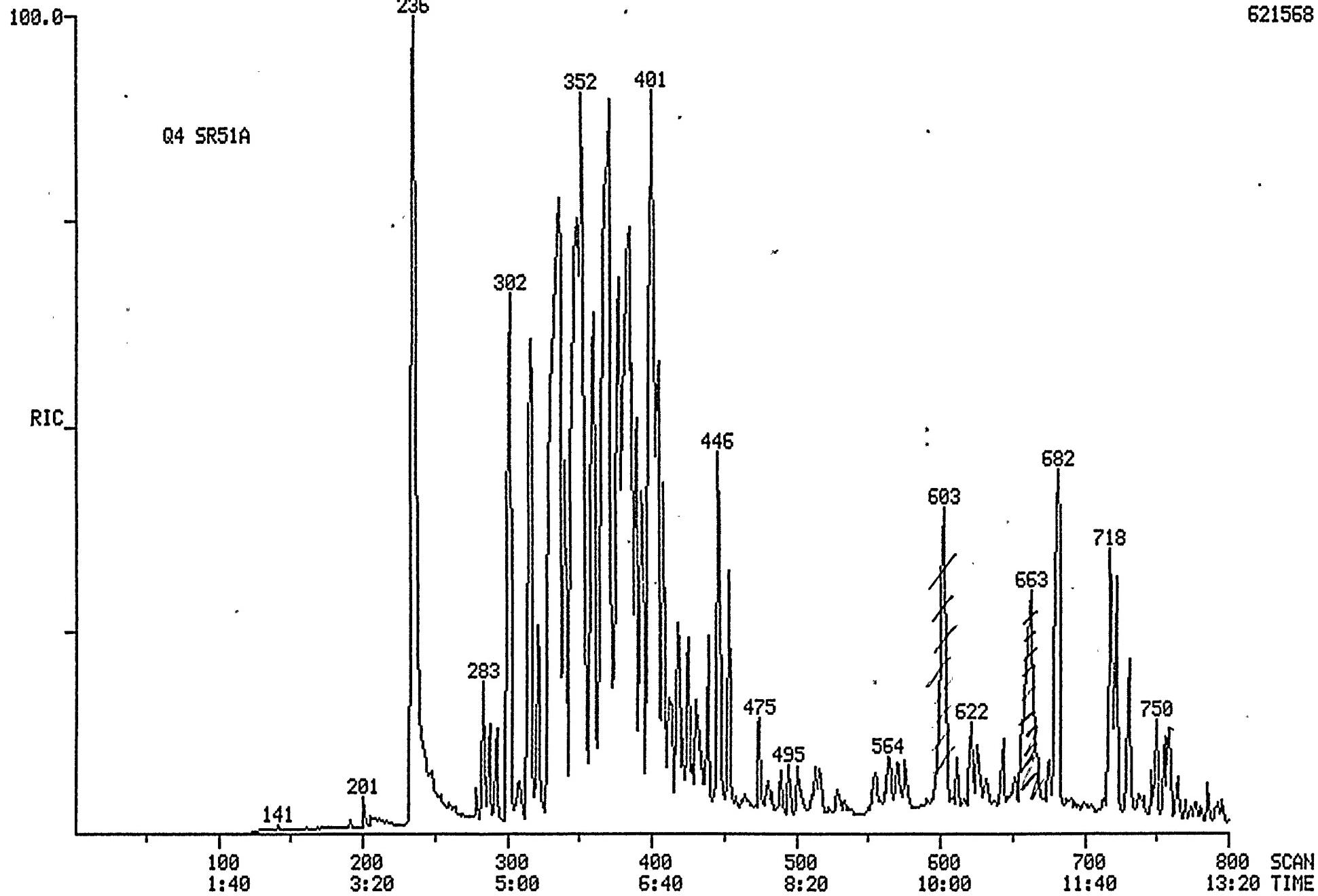
RIC
05/14/81 10:06:00

SAMPLE: Q4

RANGE: G 1, 944 LABEL: N 0, 4.0 QUAN: A 0, 1.0 BASE: U 20, 3

DATA: SR51Q4 #1
CALI: CAL331 #1

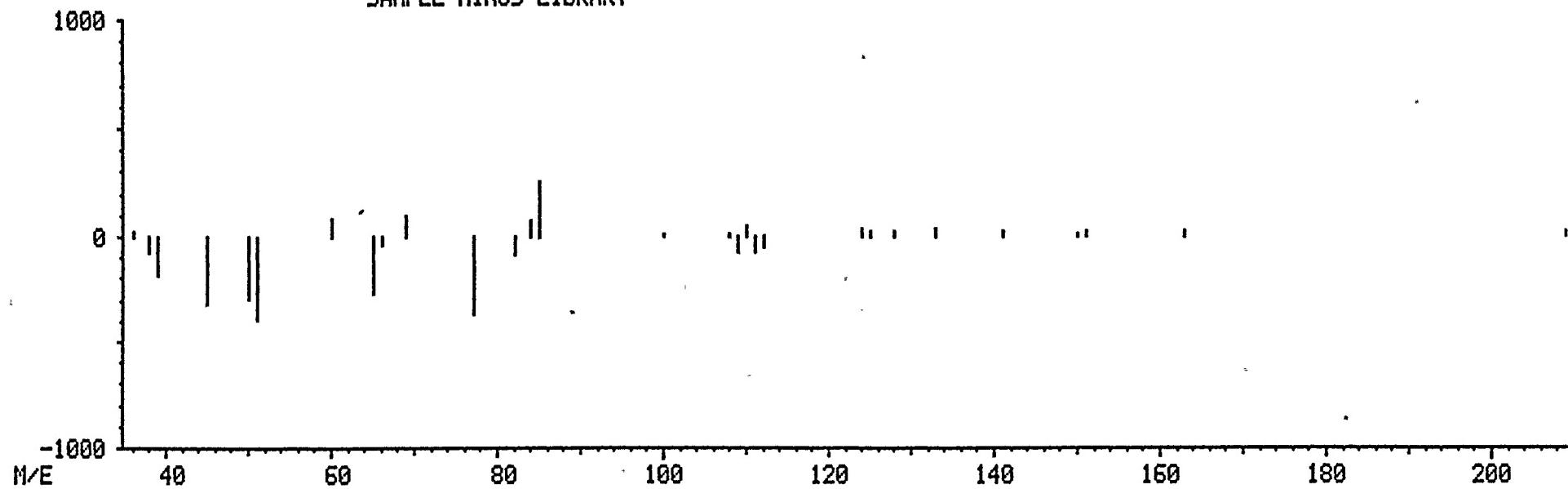
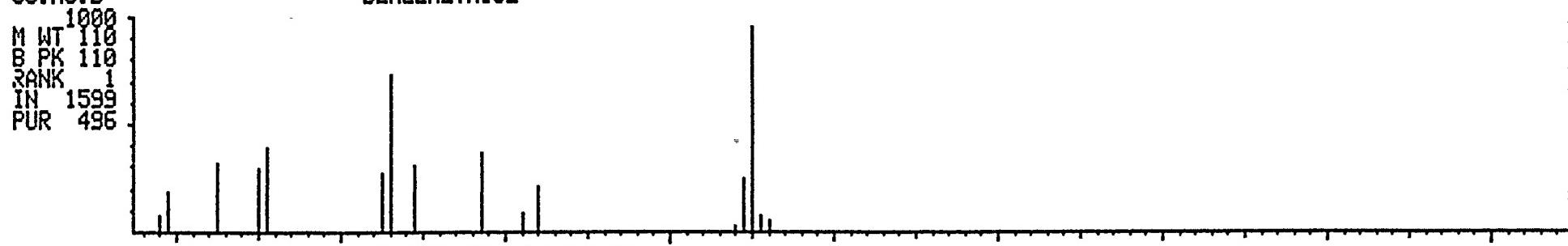
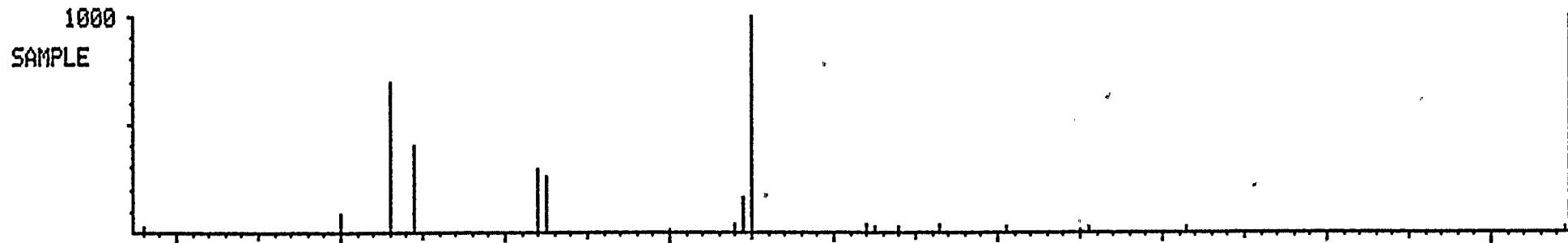
SCANS 1 TO 800



LIBRARY SEARCH
05/14/81 10:06:00 + 4:45
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 285
CALI: CAL331 # 1

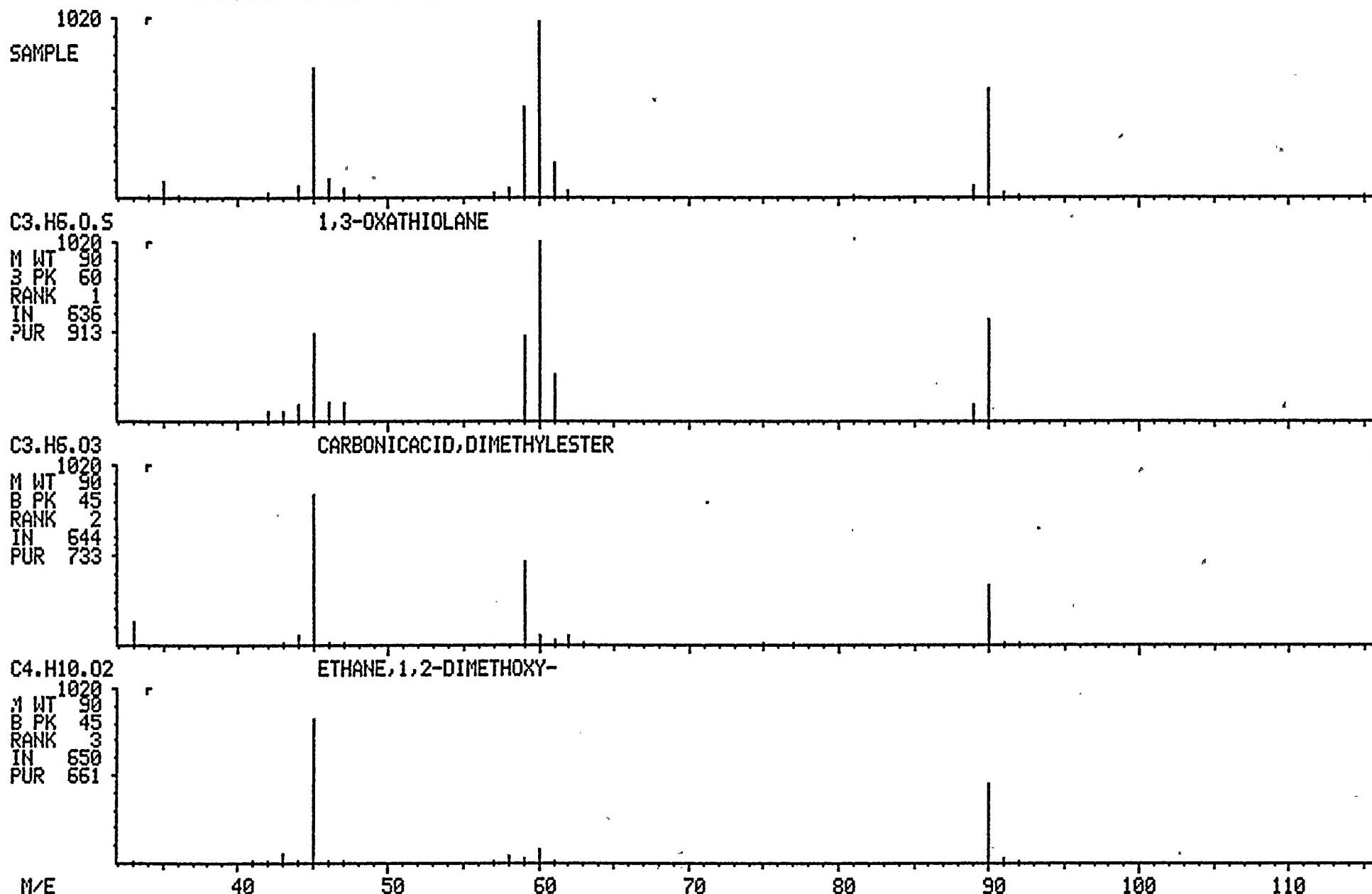
BASE M/E: 110
RIC: 911.



LIBRARY SEARCH
05/14/81 10:06:00 + 3:21
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR5104 # 201
CALI: CAL331 # 1

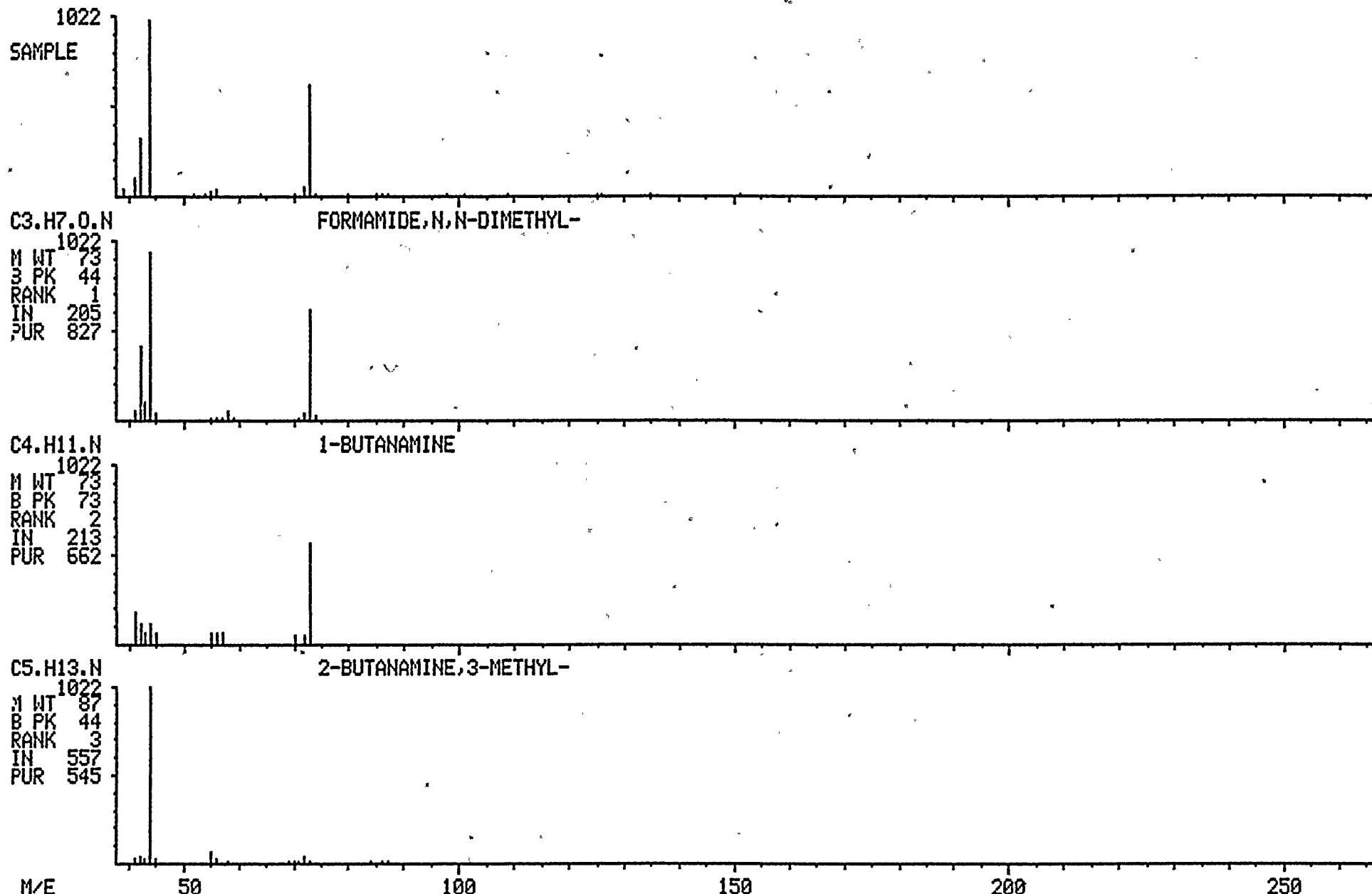
BASE M/E: 60
RIC: 14655.



LIBRARY SEARCH
05/14/81 10:06:00 + 3:26
SAMPLE: Q4
ENHANCED (S 158 2N 0T)

DATA: SR51Q4 # 206
CALI: CAL331 # 1

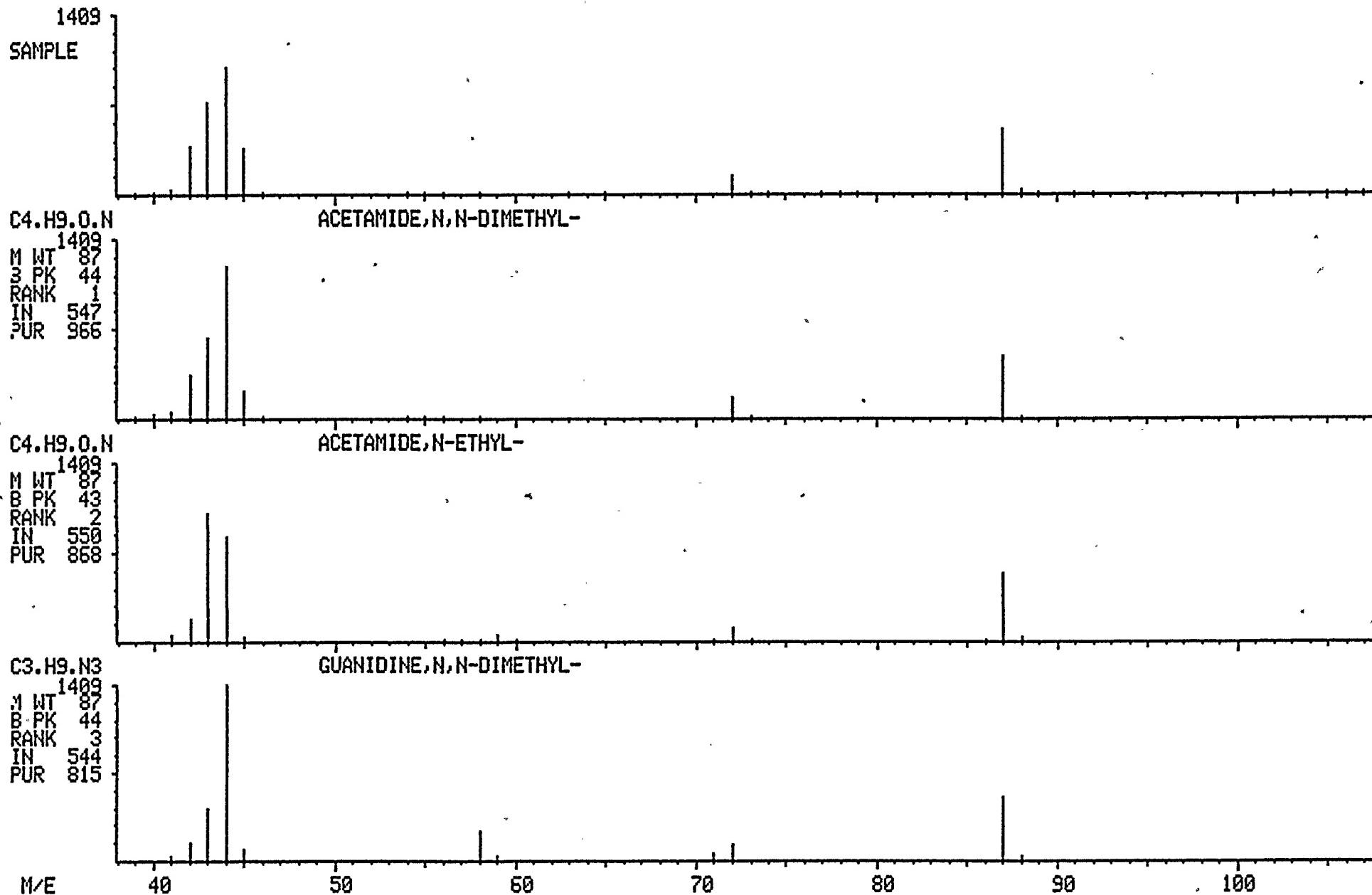
BASE M/E: 44
RIC: 3103.



LIBRARY SEARCH
05/14/81 10:06:00 + 3:56
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR5104 # 235
CALI: CAL331 # 1

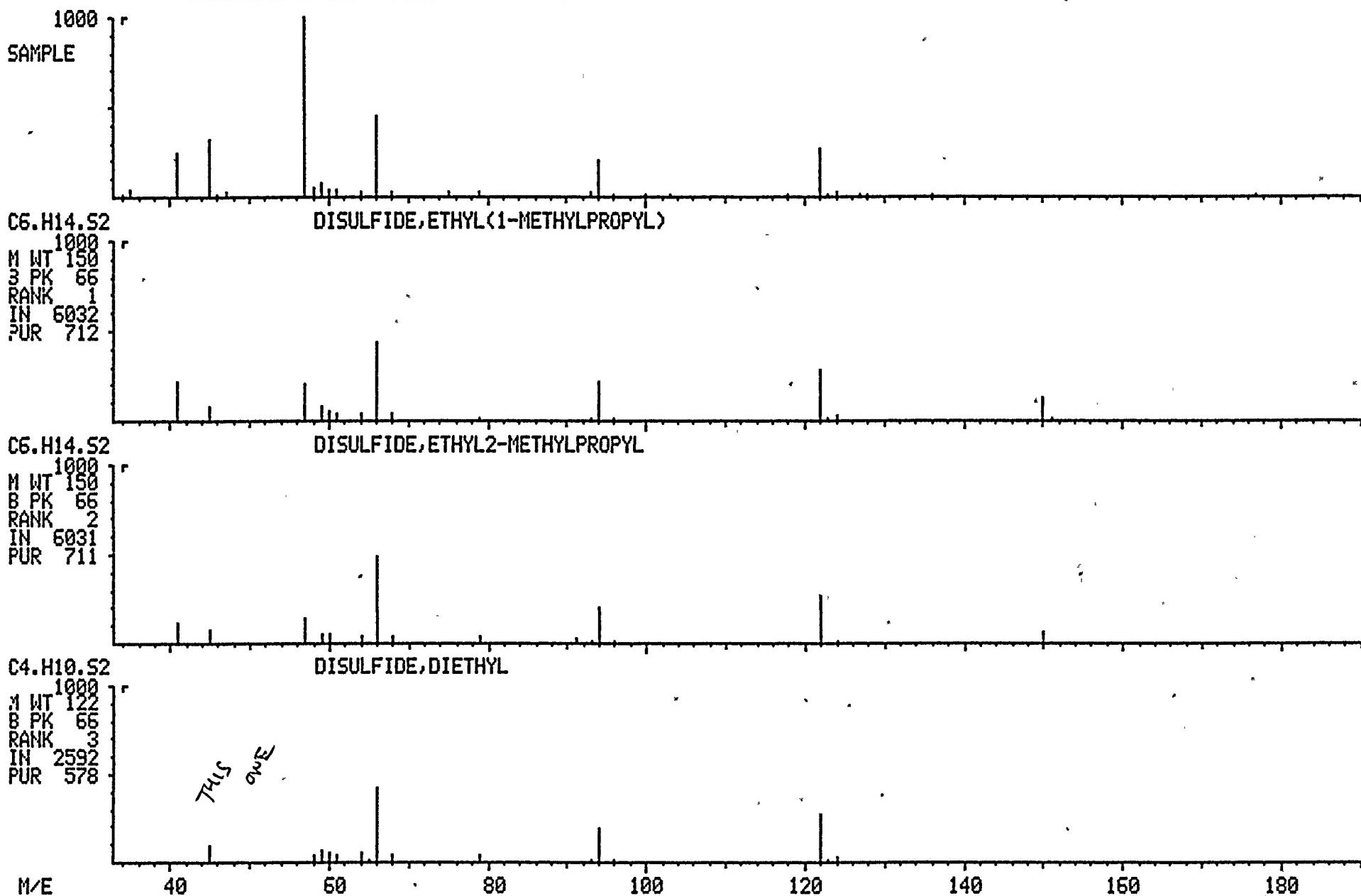
BASE M/E: 44
RIC: 533503.



LIBRARY SEARCH
05/14/81 10:06:00 + 4:20
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 260
CALI: CAL331 # 1

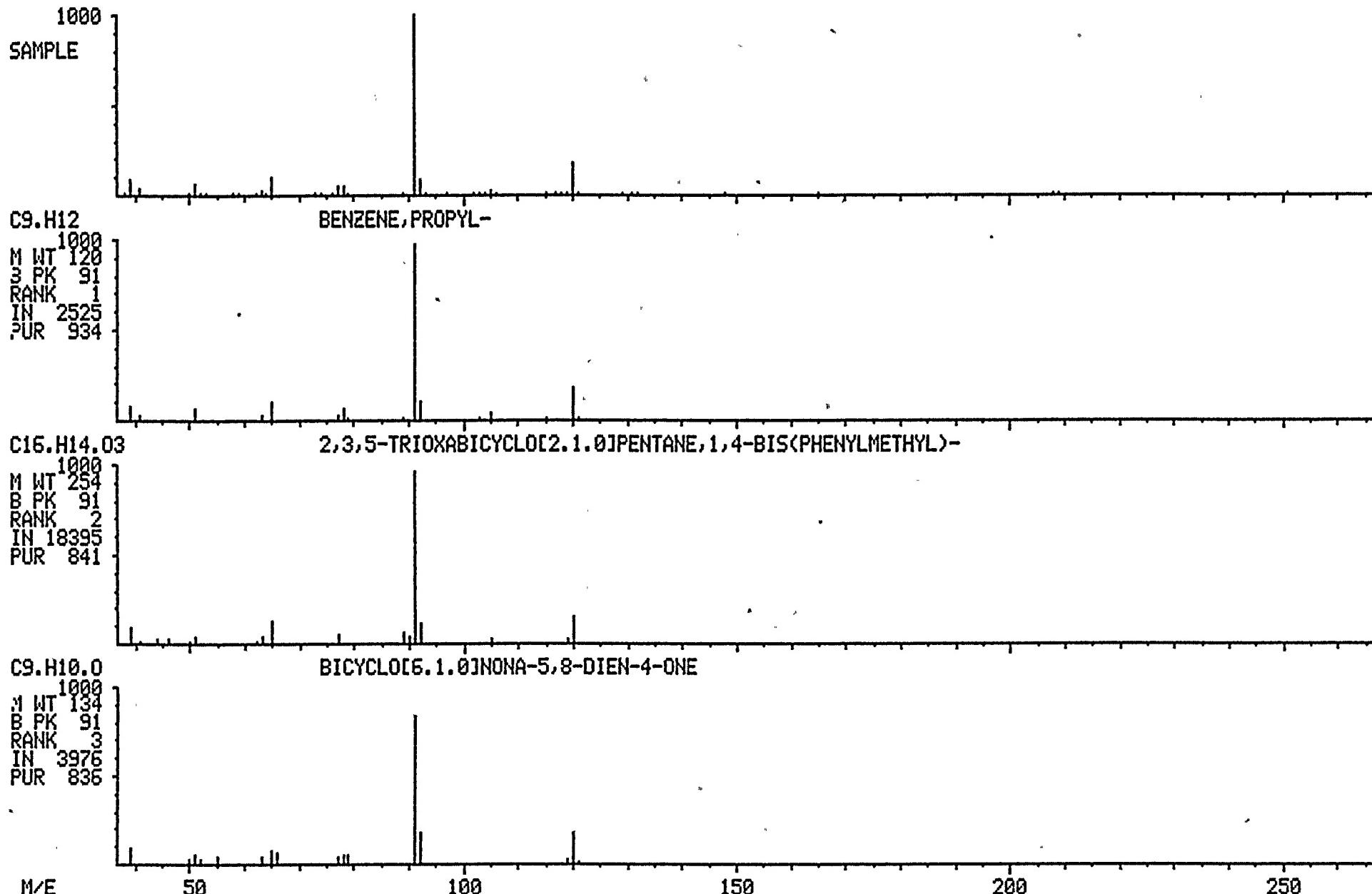
BASE M/E: 57
RIC: 2723.



LIBRARY SEARCH
05/14/81 10:06:00 + 4:39
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 279
CALI: CAL331 # 1

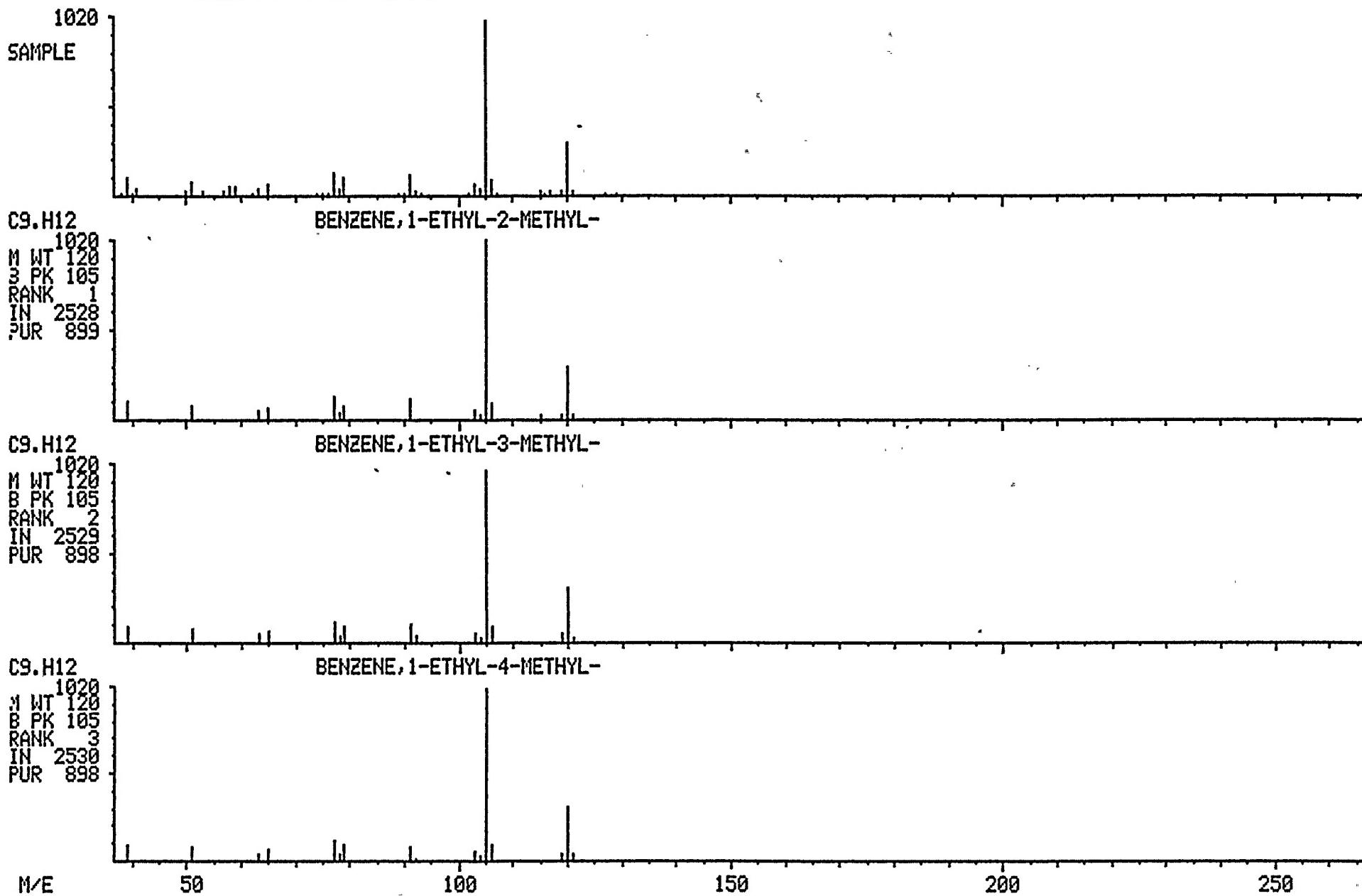
BASE M/E: 91
RIC: 16831.



LIBRARY SEARCH
05/14/81 10:06:00 + 4:43
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 283
CALI: CAL331 # 1

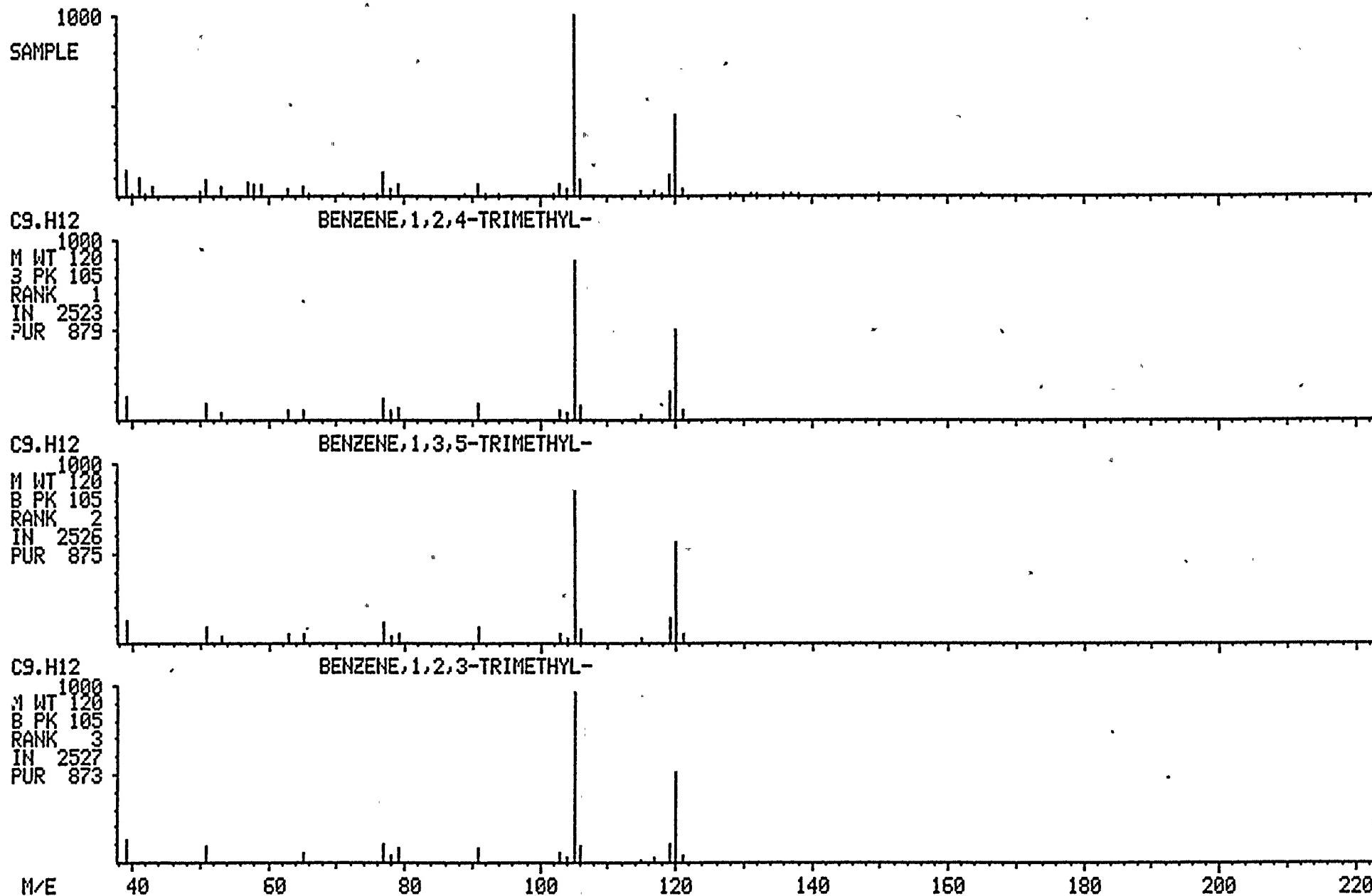
BASE M/E: 105
RIC: 86143.



LIBRARY SEARCH
05/14/81 10:06:00 + 4:48
SAMPLE: Q4
ENHANCED (S 15B 2H 0T)

DATA: SR51Q4 # 288
CALI: CAL331 # 1

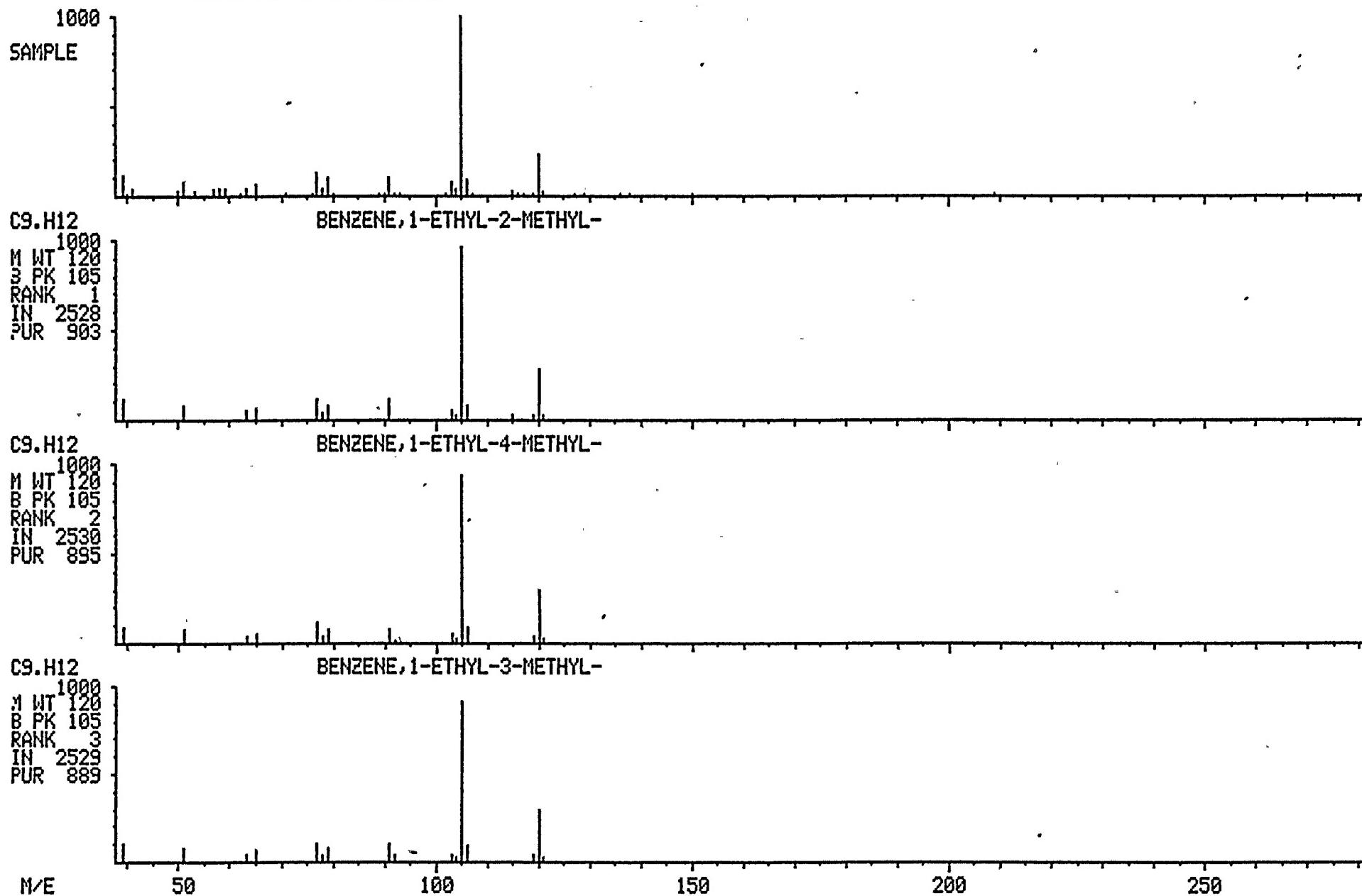
BASE M/E: 105
RIC: 55999.



LIBRARY SEARCH
05/14/81 10:06:00 + 4:53
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR5104 # 293
CALI: CAL331 # 1

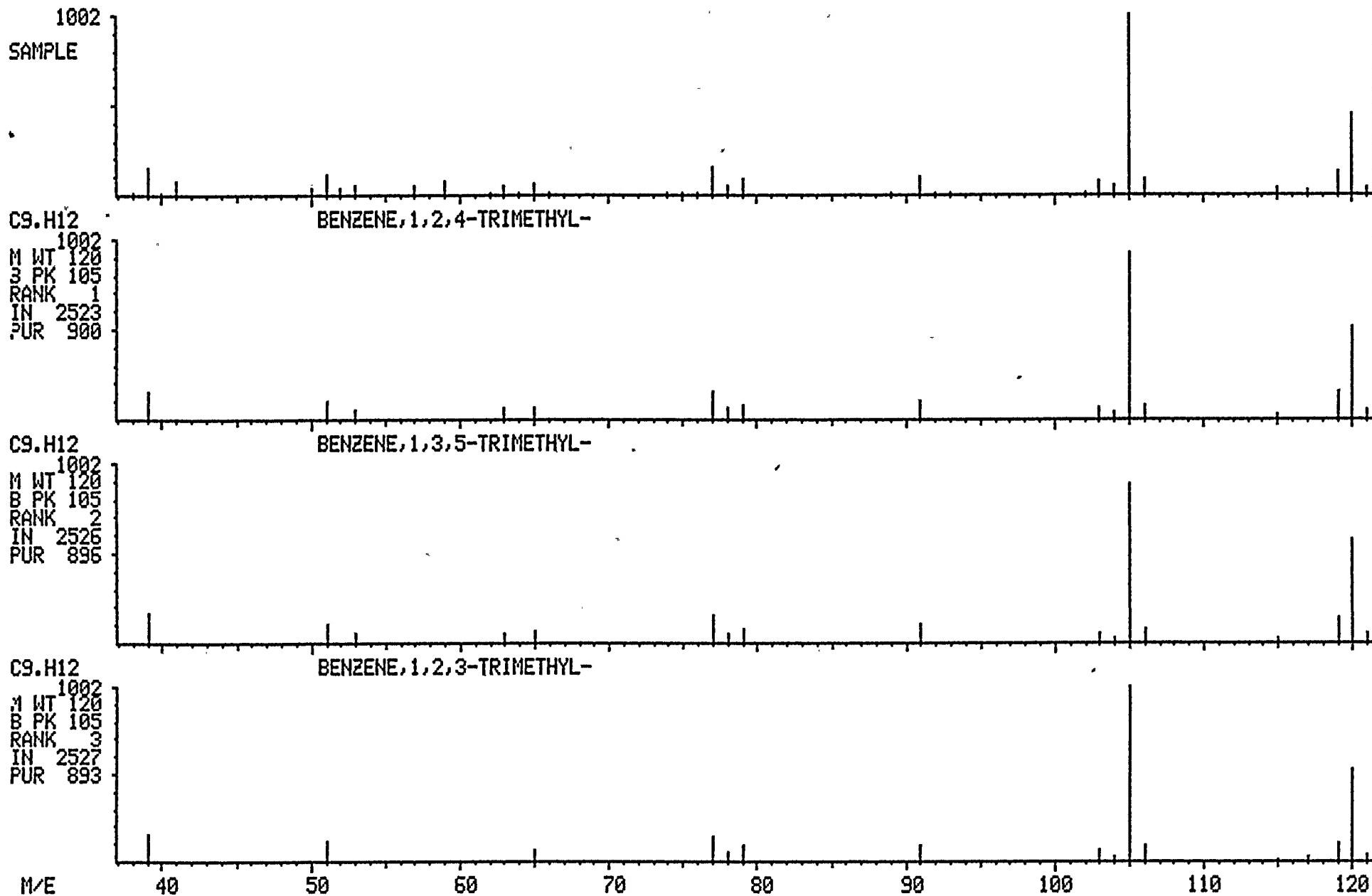
BASE M/E: 105
RIC: 53055.



LIBRARY SEARCH
05/14/81 10:06:00 + 5:02
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR5104 # 302
CALI: CAL331 # 1

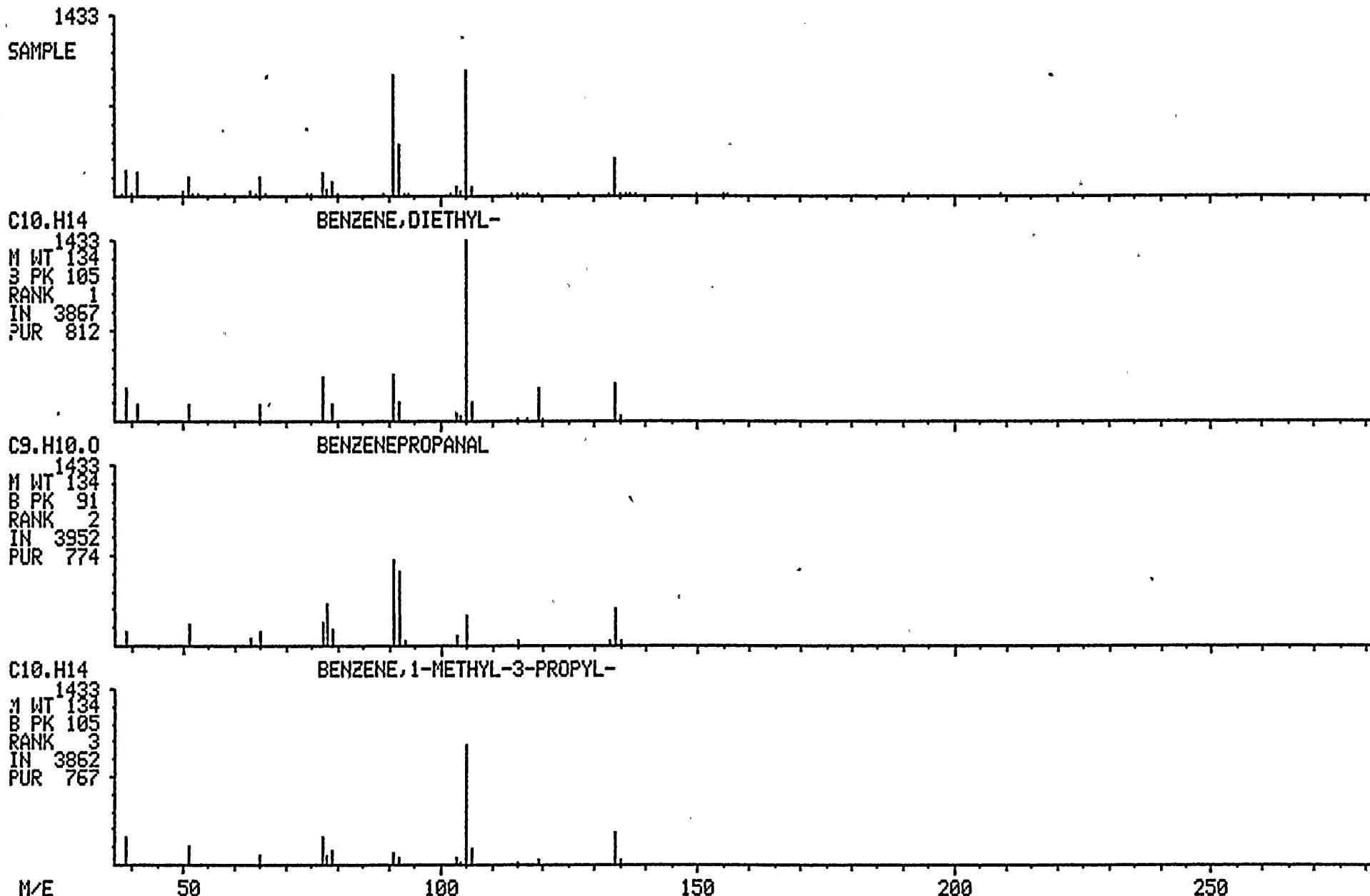
BASE M/E: 105
RIC: 314879.



LIBRARY SEARCH
05/14/81 10:06:00 + 5:09
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 309
CALI: CAL331 # 1

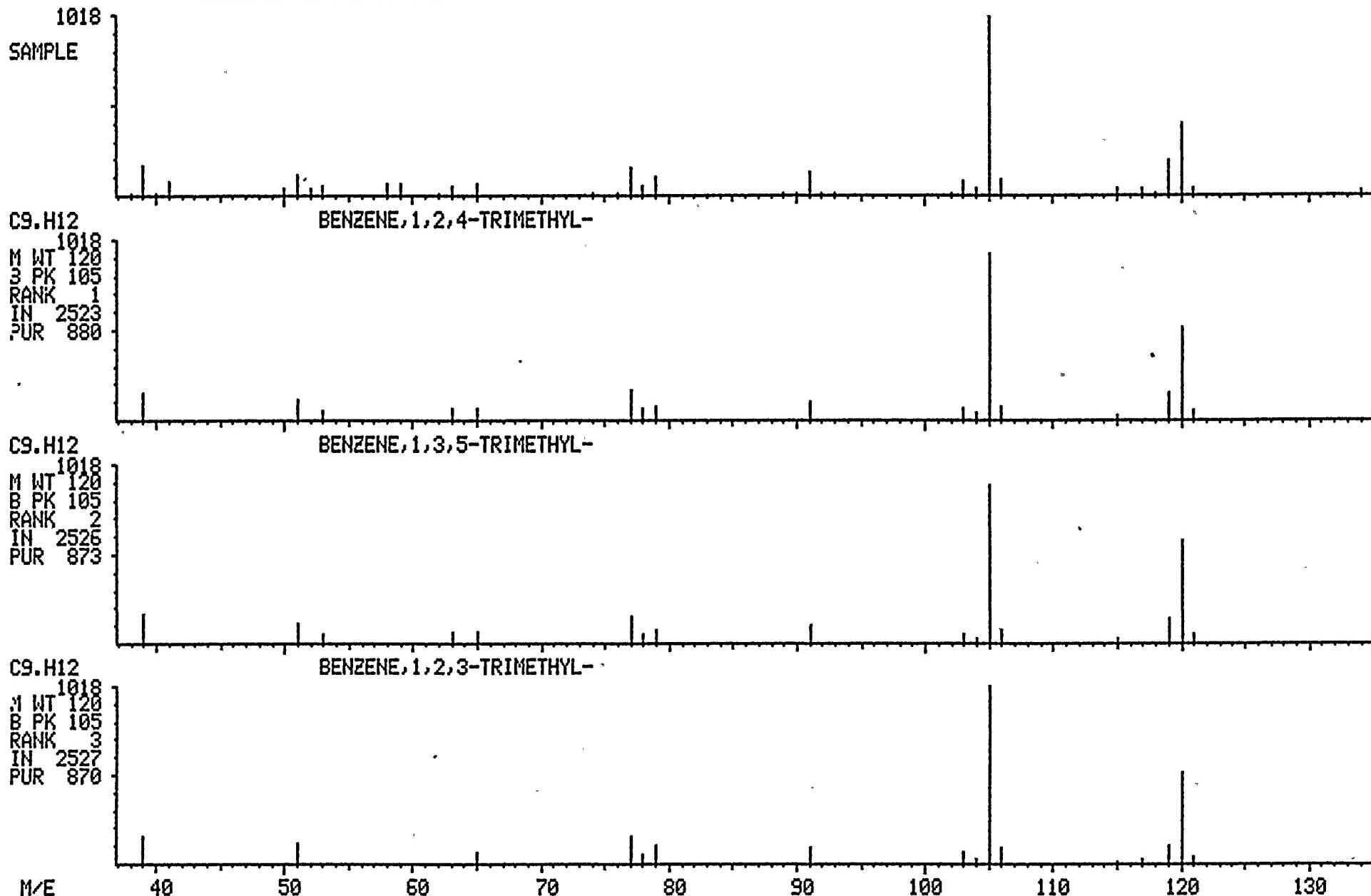
BASE M/E: 105
RIC: 23647.



LIBRARY SEARCH
05/14/81 10:06:00 + 5:16
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 316
CALI: CAL331 # 1

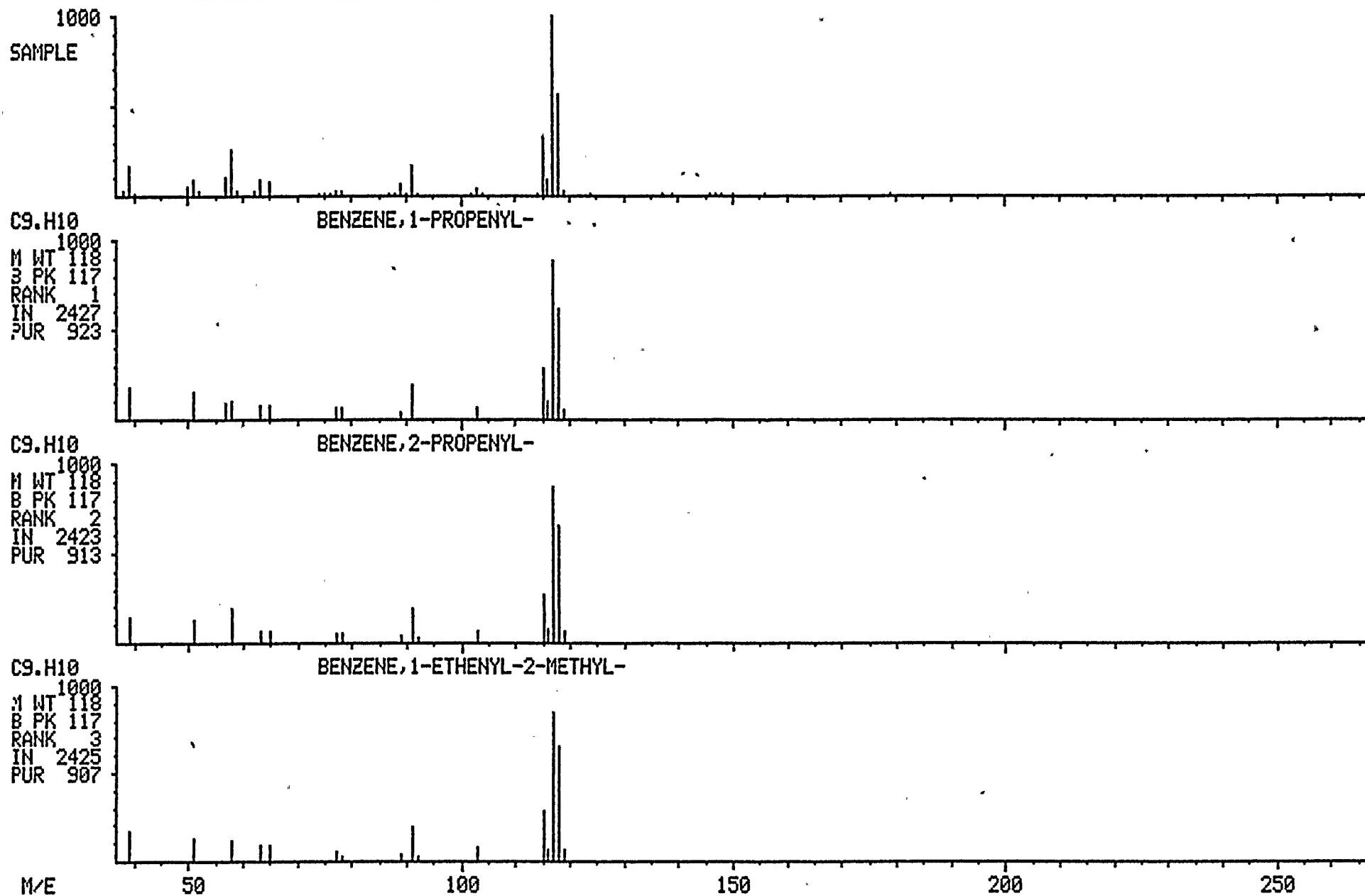
BASE M/E: 105
RIC: 355327.



LIBRARY SEARCH
05/14/81 10:06:00 + 5:21
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 321
CALI: CAL331 # 1

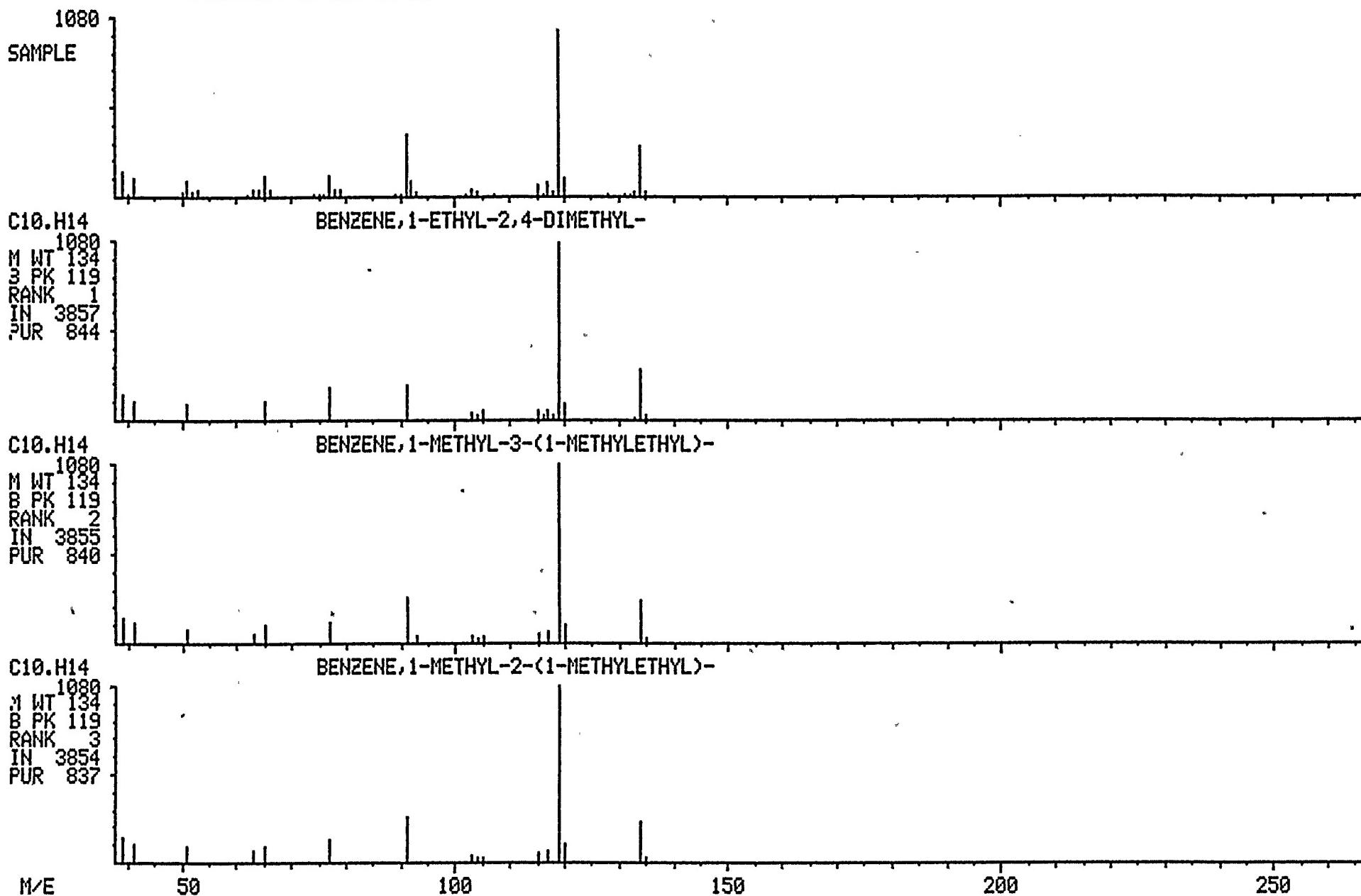
BASE M/E: 117
RIC: 109439.



LIBRARY SEARCH
05/14/81 10:06:00 + 5:36
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 336
CALI: CAL331 # 1

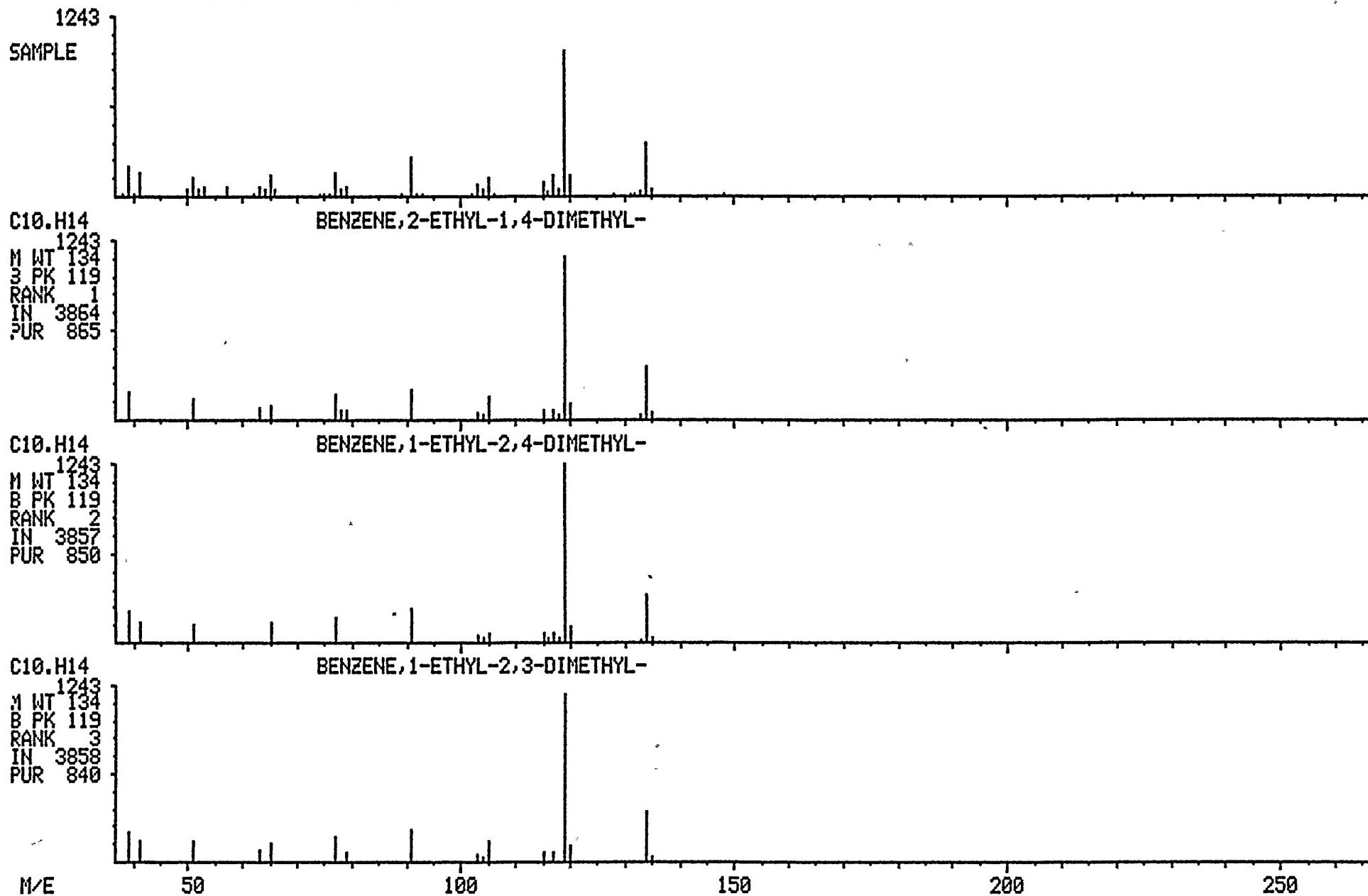
BASE M/E: 119
RIC: 310783.



LIBRARY SEARCH
05/14/81 10:06:00 + 5:52
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 352
CALI: CAL331 # 1

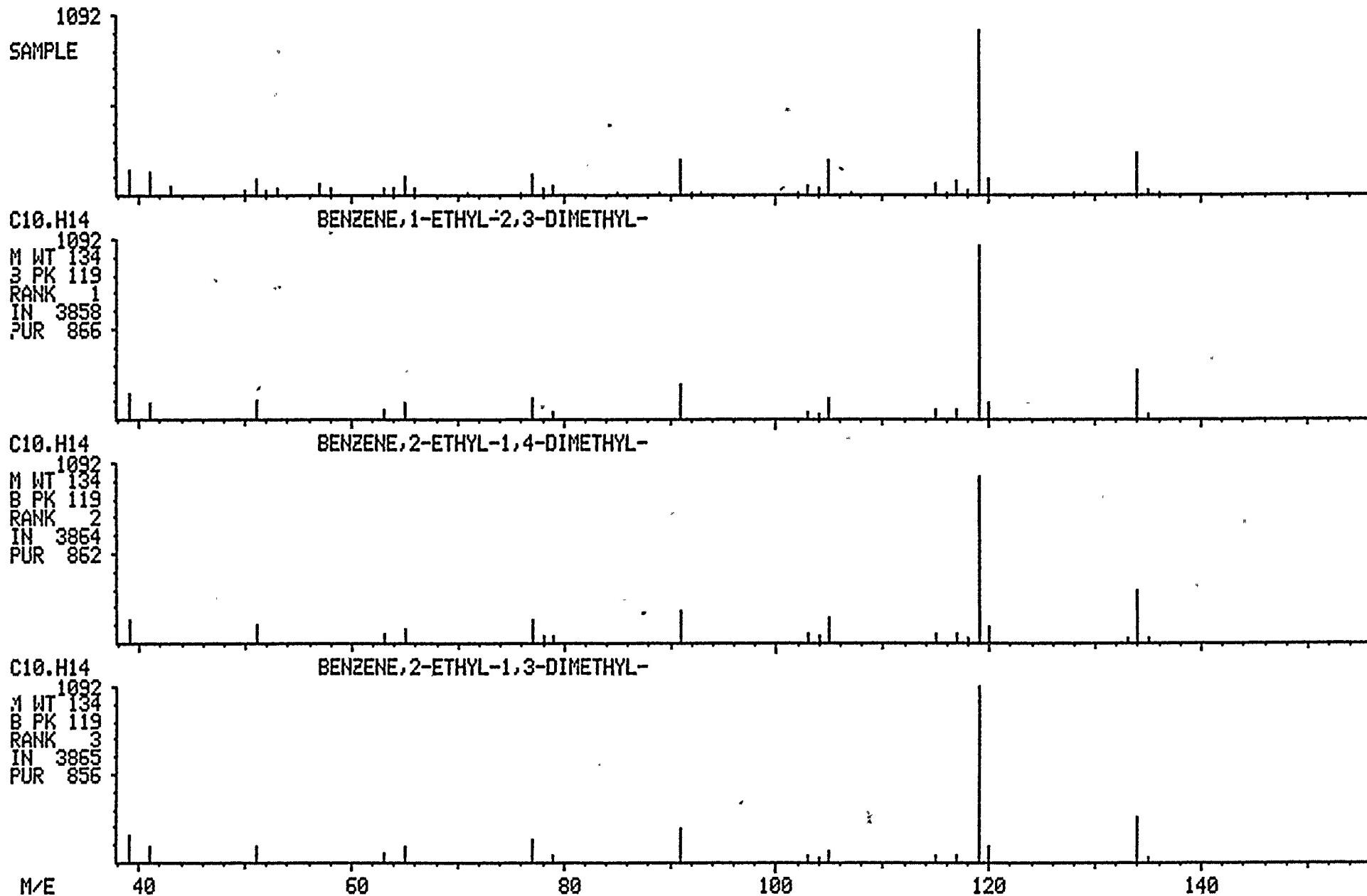
BASE M/E: 119
RIC: 390655.



LIBRARY SEARCH
05/14/81 10:06:00 + 6:00
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 350
CALI: CAL331 # 1

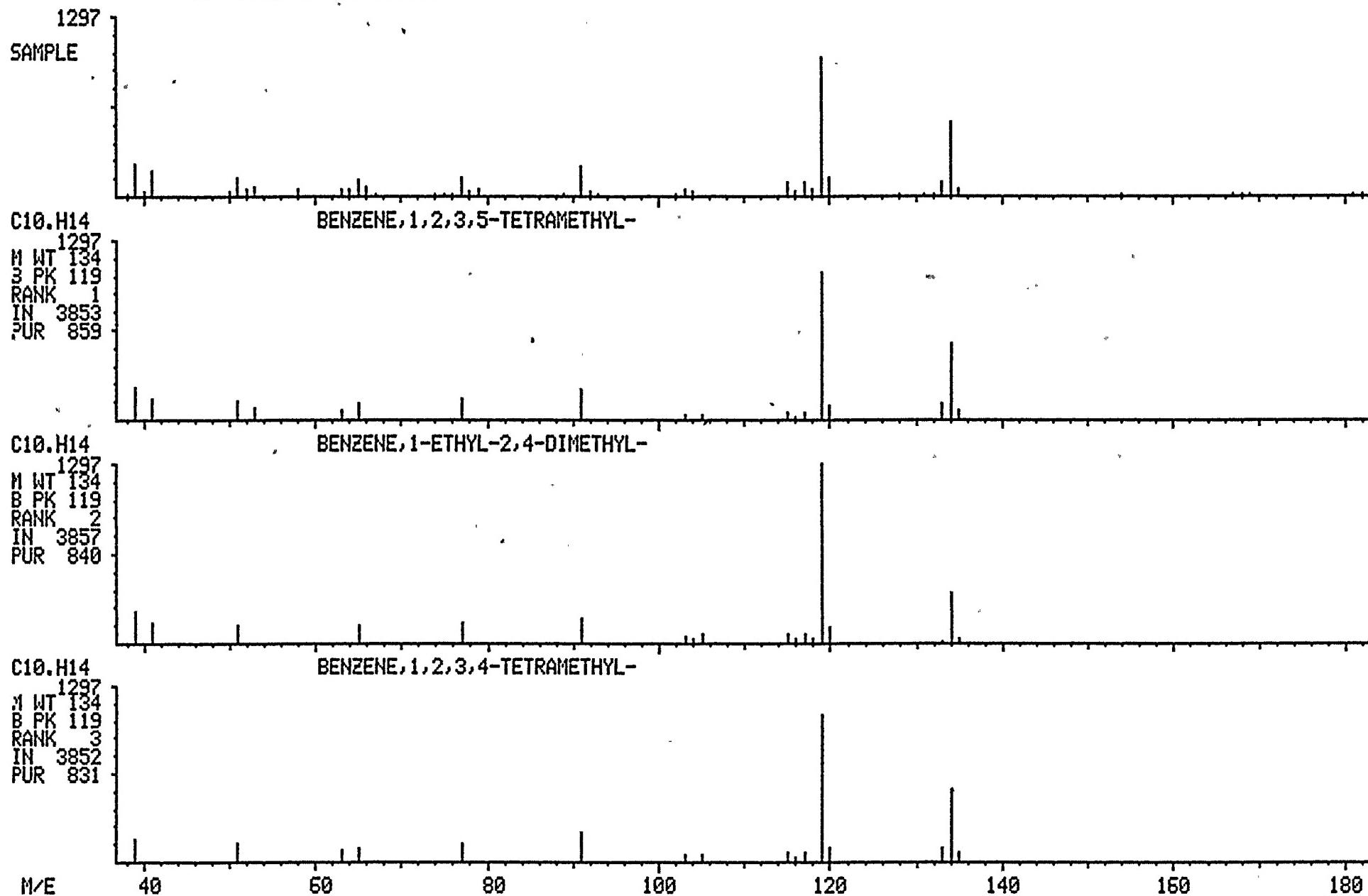
BASE M/E: 119
RIC: 296959.



LIBRARY SEARCH
05/14/81 10:06:00 + 6:11
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 371
CALI: CAL331 # 1

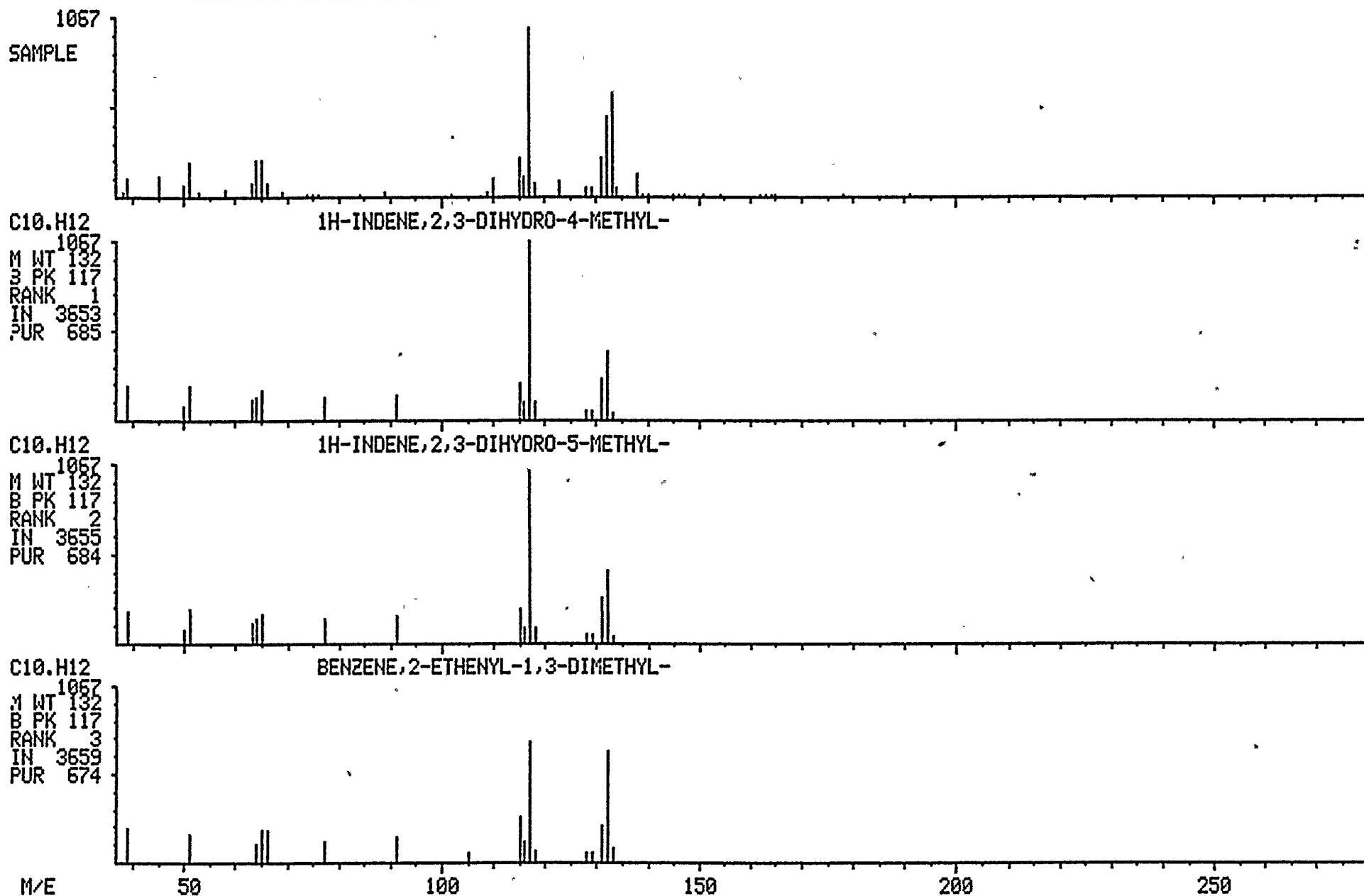
BASE M/E: 119
RIC: 356863.



LIBRARY SEARCH
05/14/81 10:06:00 + 6:18
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 378
CALI: CAL331 # 1

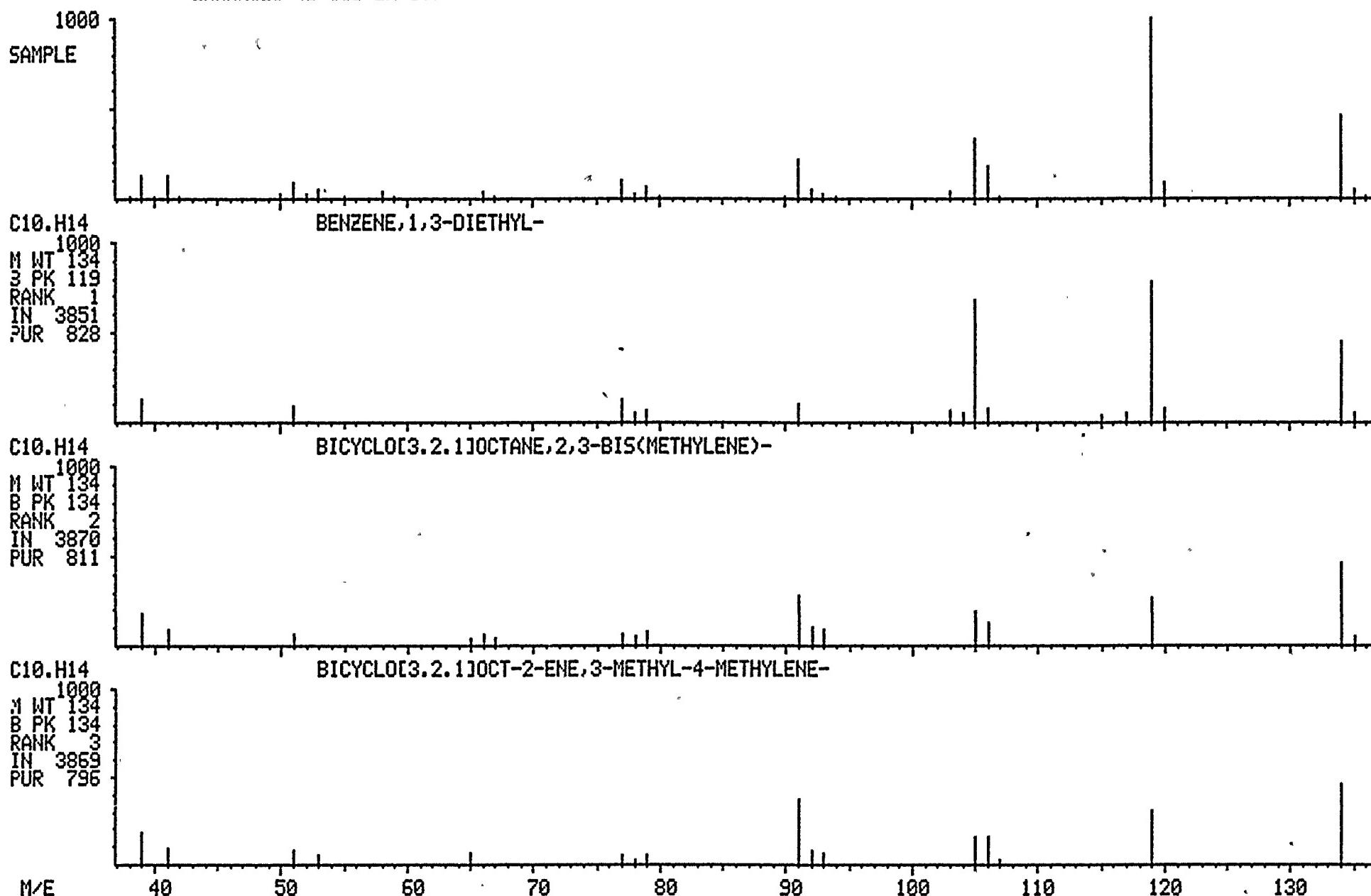
BASE M/E: 117
RIC: 173823.



LIBRARY SEARCH
05/14/81 10:06:00 + 6:25
SAMPLE: Q4
ENHANCED (S 158 2N 0T)

DATA: SR51Q4 # 385
CALI: CAL331 # 1

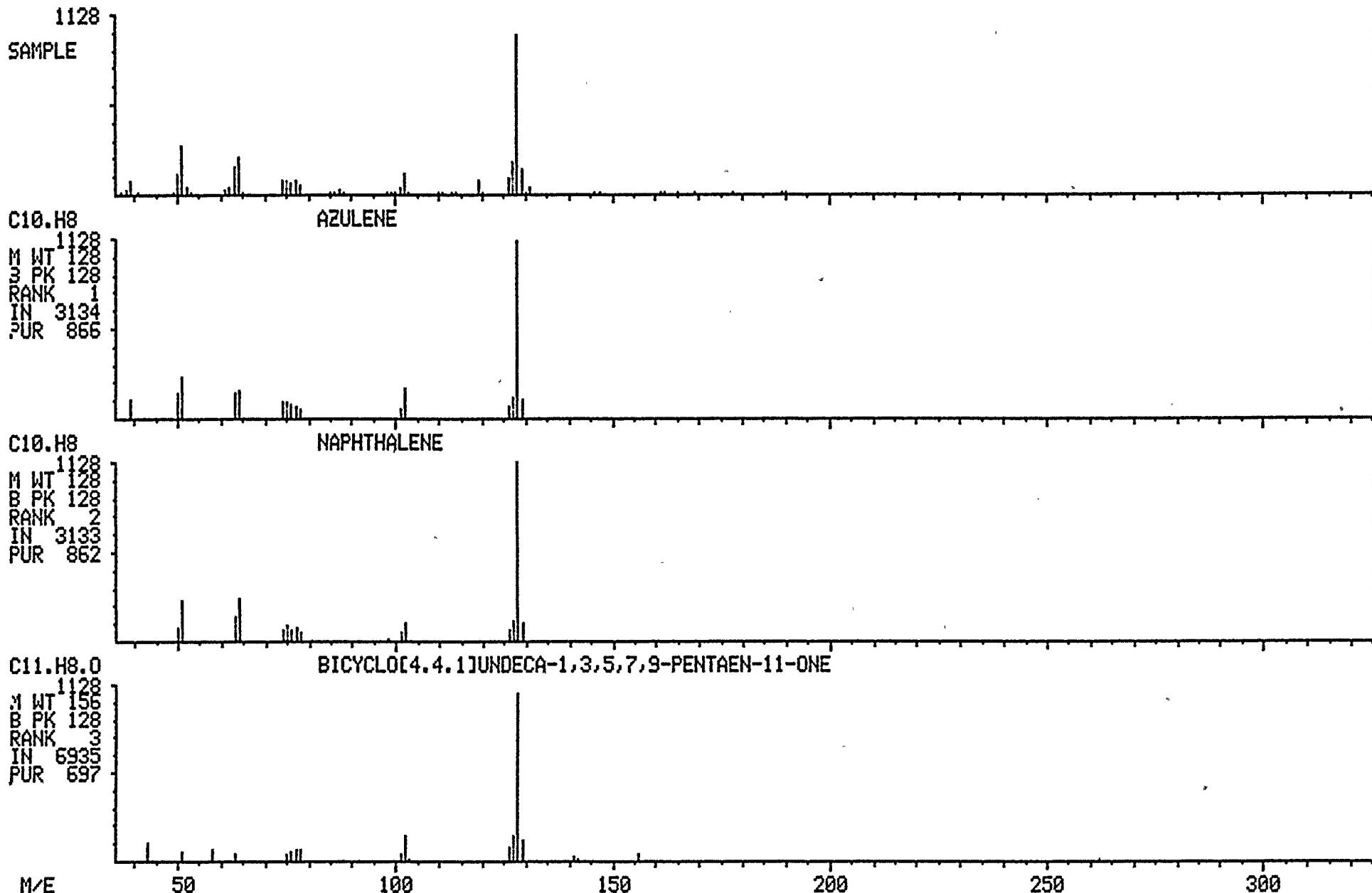
BASE M/E: 119
RIC: 249087.



LIBRARY SEARCH
05/14/81 10:06:00 + 6:41
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR5104 # 401
CALI: CAL331 # 1

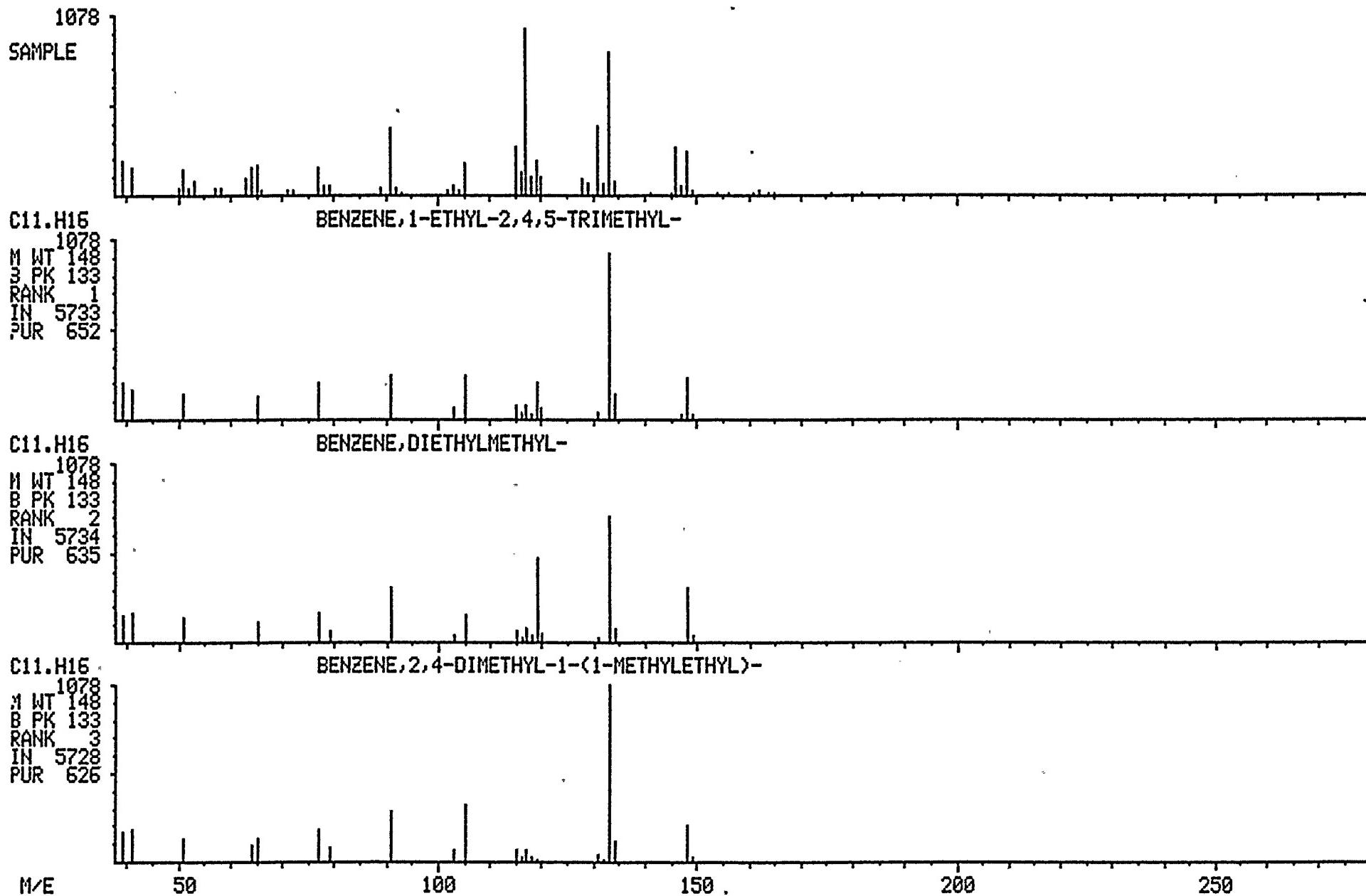
BASE M/E: 128
RIC: 458751.



LIBRARY SEARCH
05/14/81 10:06:00 + 6:58
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 418
CALI: CAL331 # 1

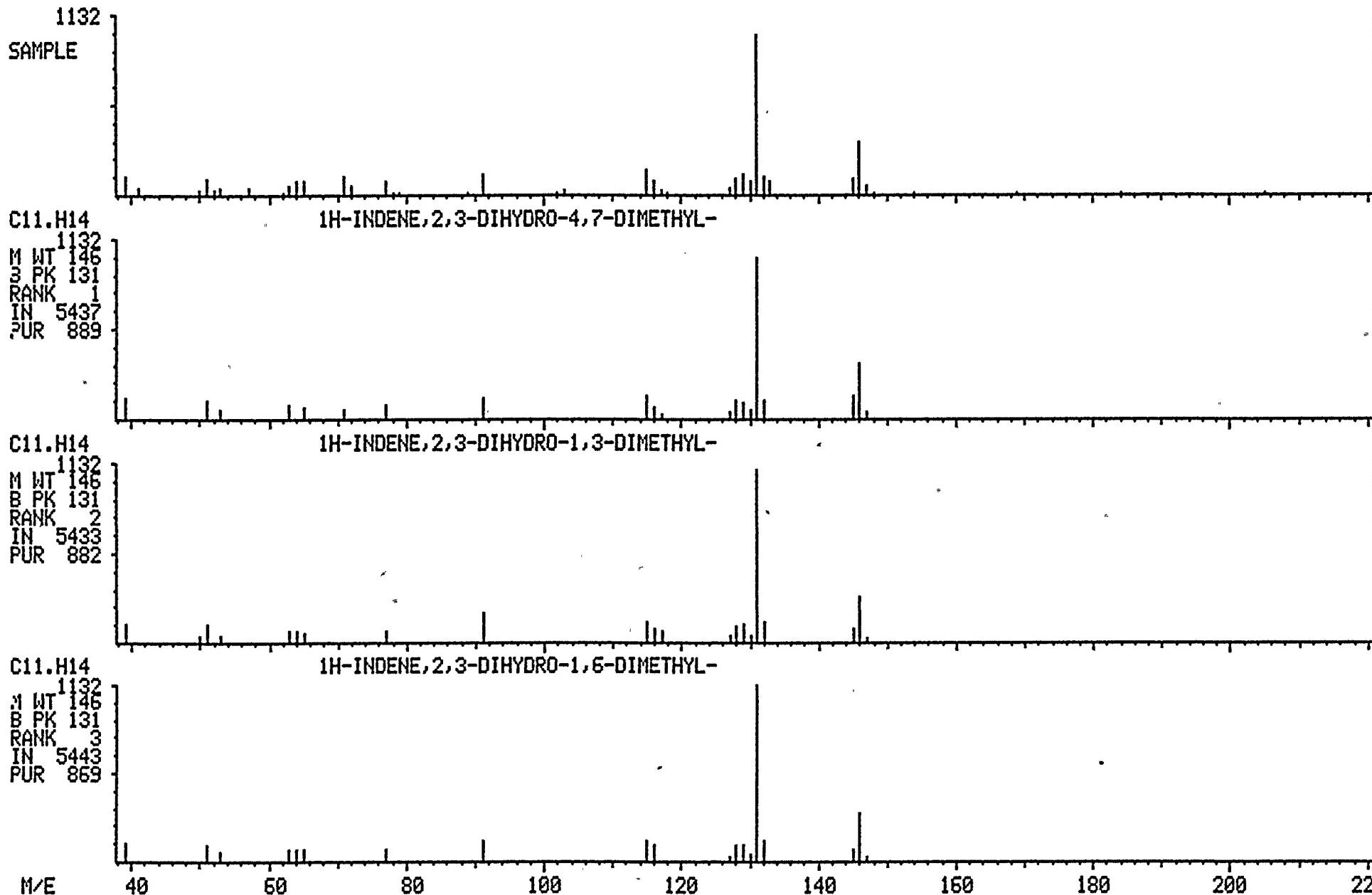
BASE M/E: 117
RIC: 102271.



LIBRARY SEARCH
05/14/81 10:06:00 + 7:06
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR5104 # 426
CALI: CAL331 # 1

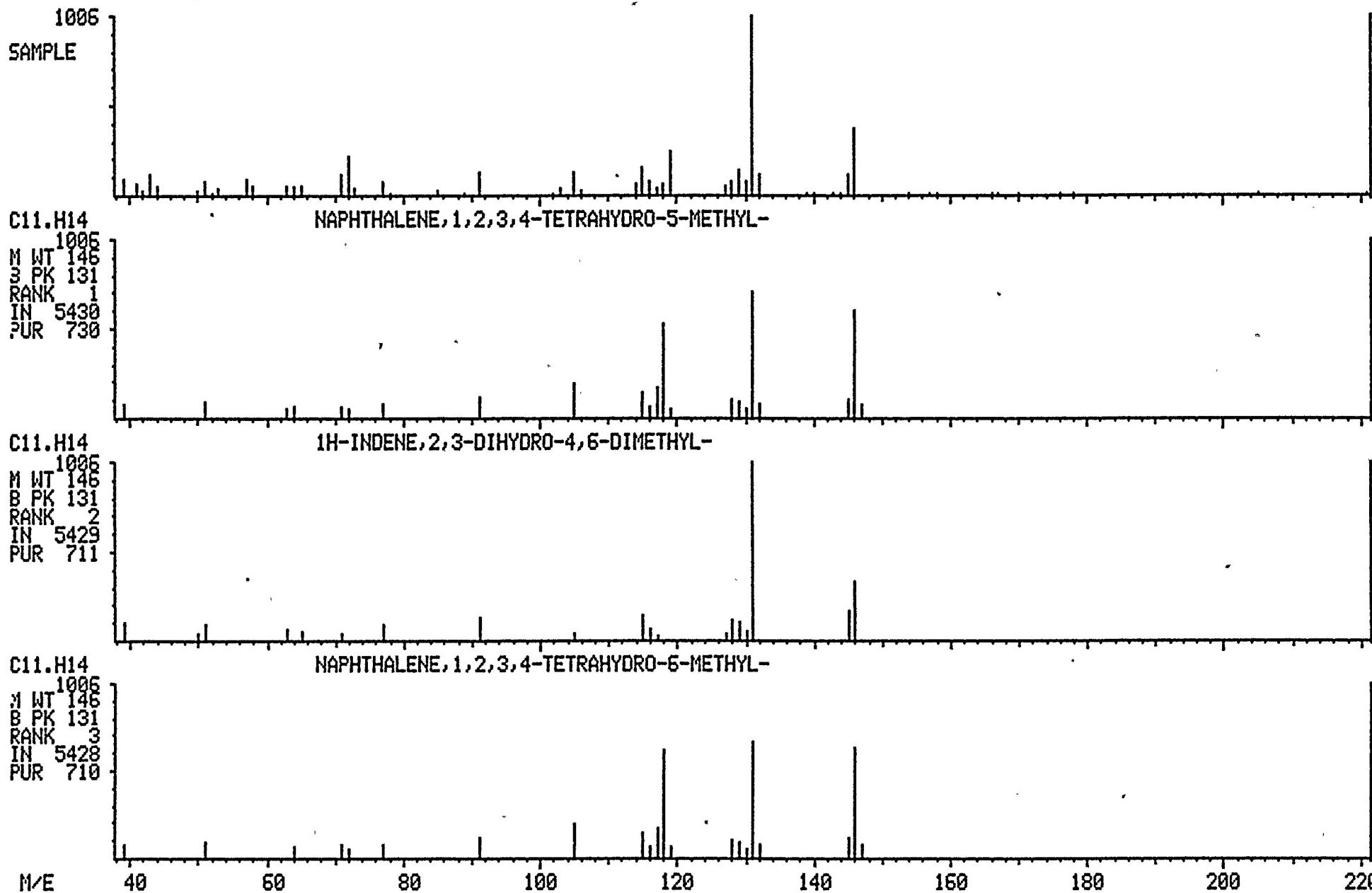
BASE M/E: 131
RIC: 77055.



LIBRARY SEARCH
05/14/81 10:06:00 + 7:11
SAMPLE: Q4
ENHANCED (S 15B 2H 0T)

DATA: SR5104 # 431
CALI: CAL331 # 1

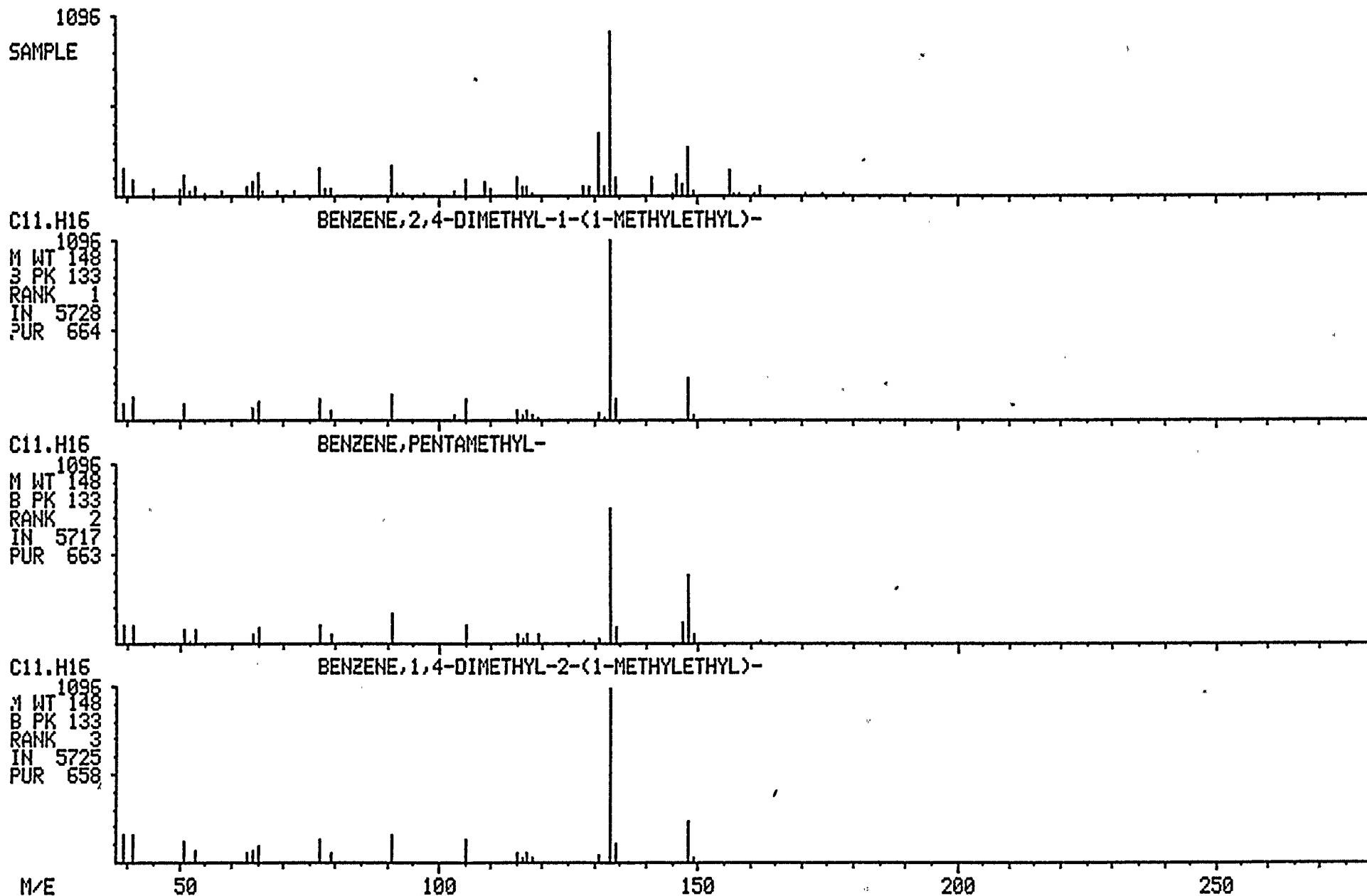
BASE M/E: 131
RIC: 44607.



LIBRARY SEARCH
05/14/81 10:06:00 + 7:19
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 439
CALI: CAL331 # 1

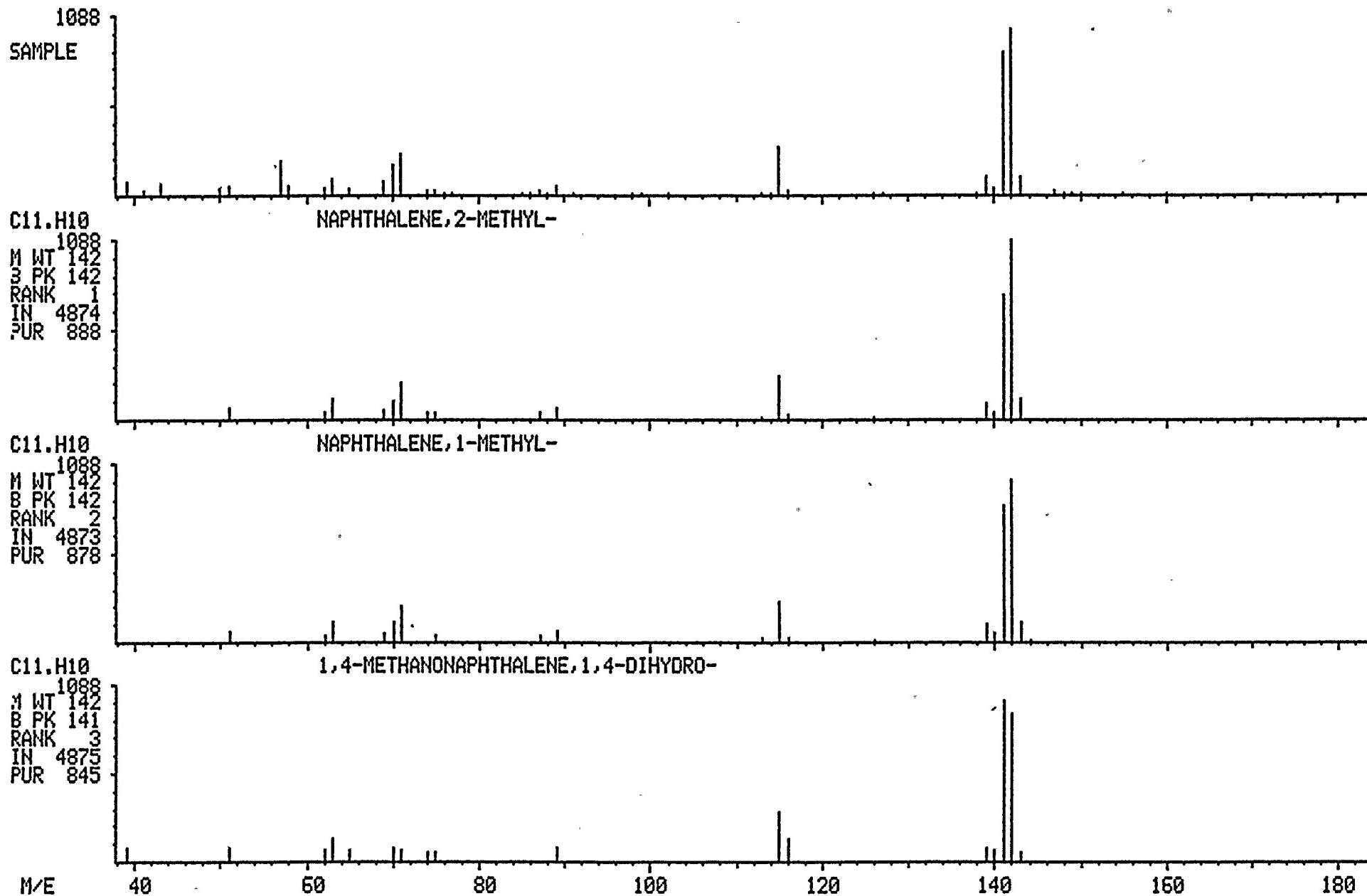
BASE M/E: 133
RIC: 84735.



LIBRARY SEARCH
05/14/81 10:06:00 + 7:26
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 446
CALI: CAL331 # 1

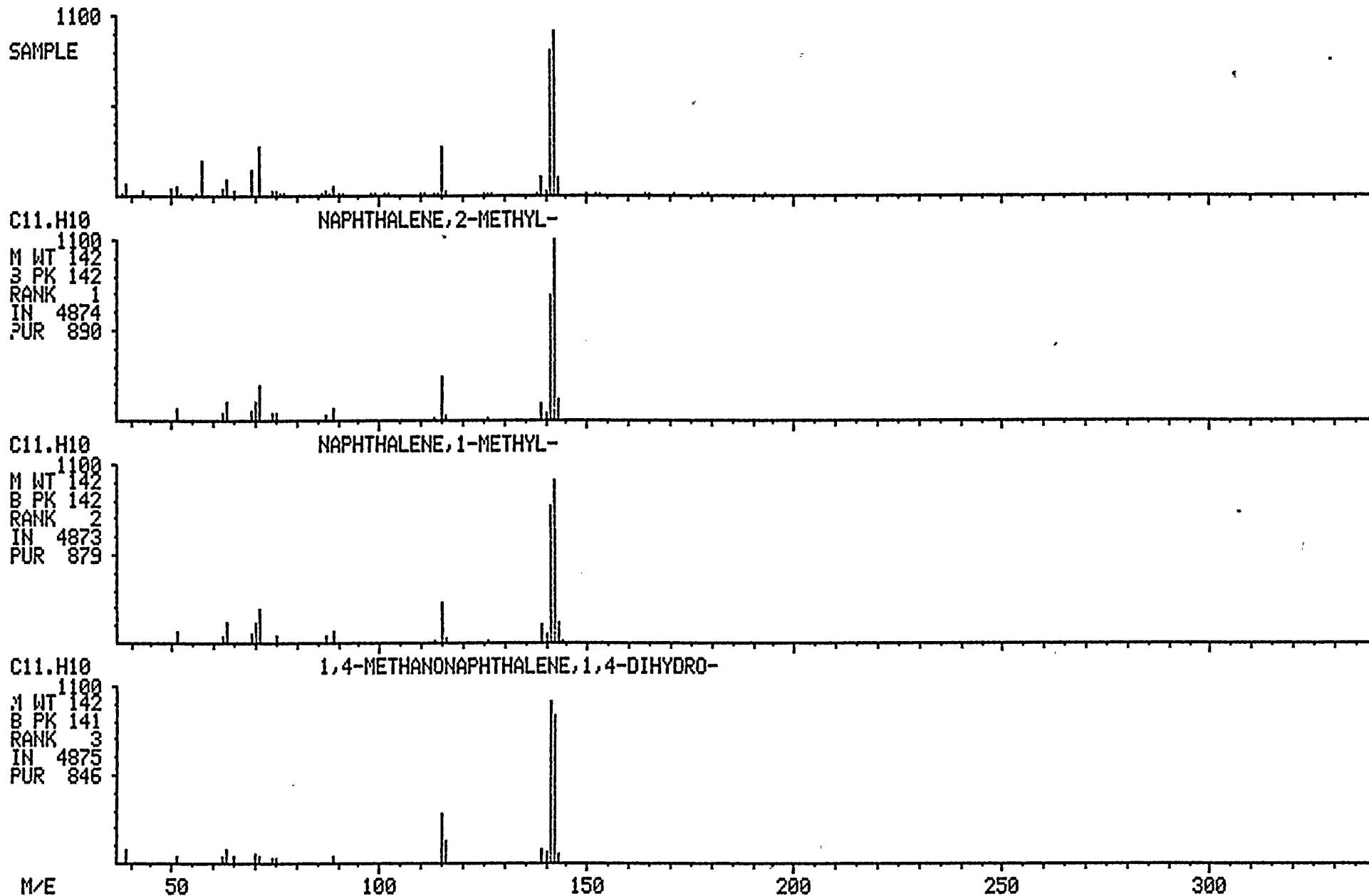
BASE M/E: 142
RIC: 209919.



LIBRARY SEARCH
05/14/81 10:06:00 + 7:33
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 453
CALI: CAL331 # 1

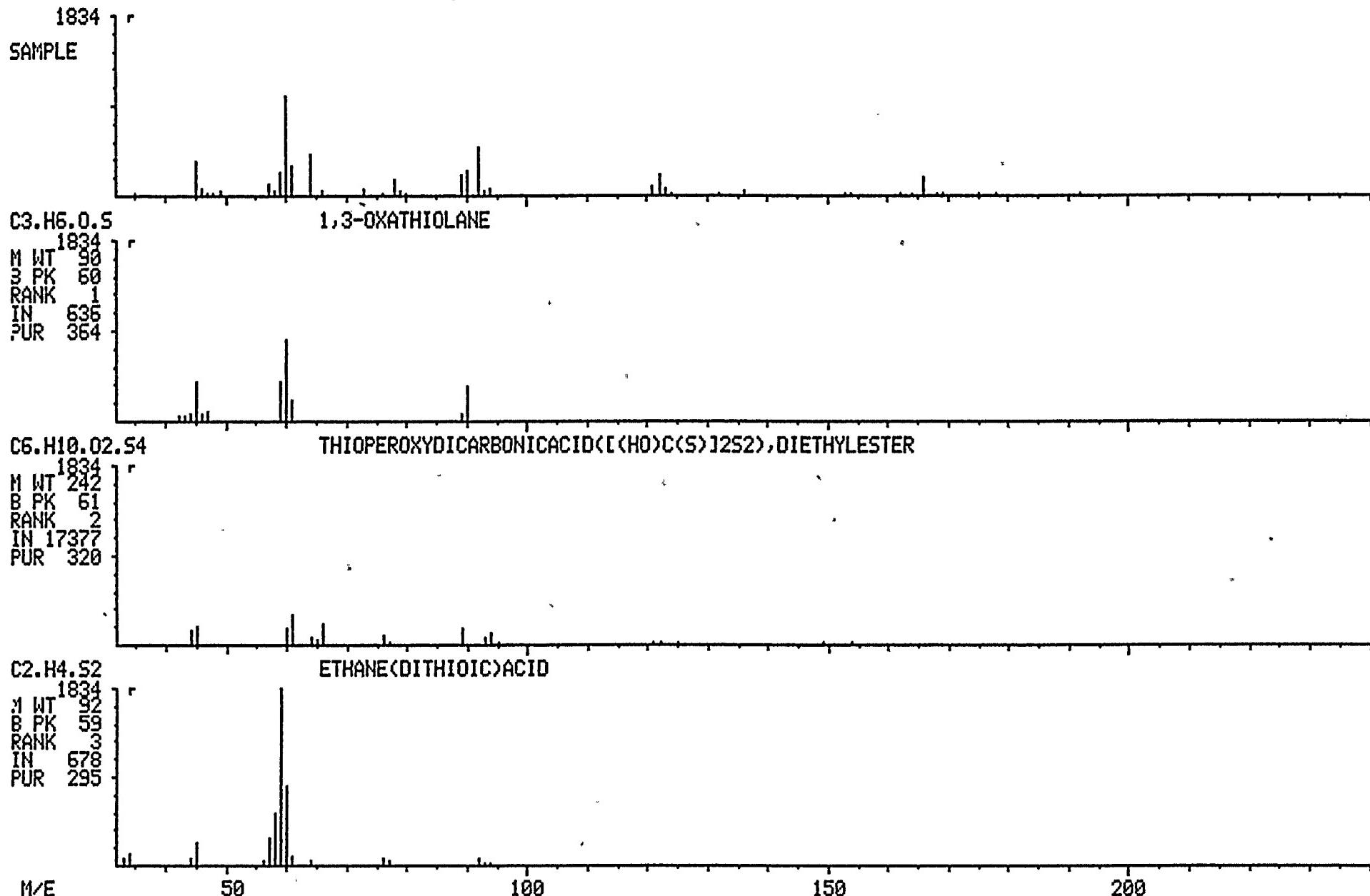
BASE M/E: 142
RIC: 113663.



LIBRARY SEARCH
05/14/81 10:06:00 + 7:45
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 465
CALI: CAL331 # 1

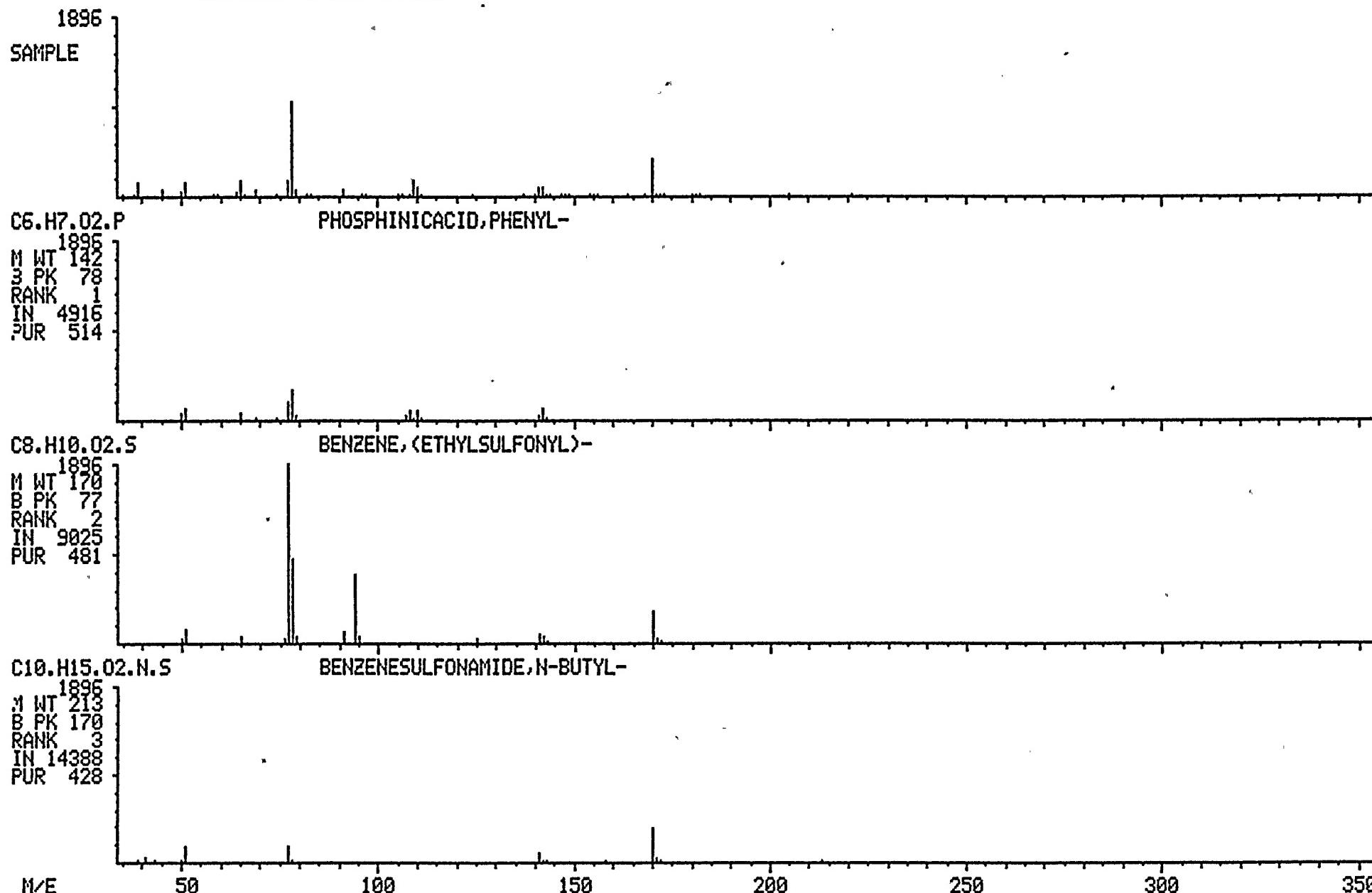
BASE M/E: 60
RIC: 7255.



LIBRARY SEARCH
05/14/81 10:06:00 + 7:55
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 475
CALI: CAL331 # 1

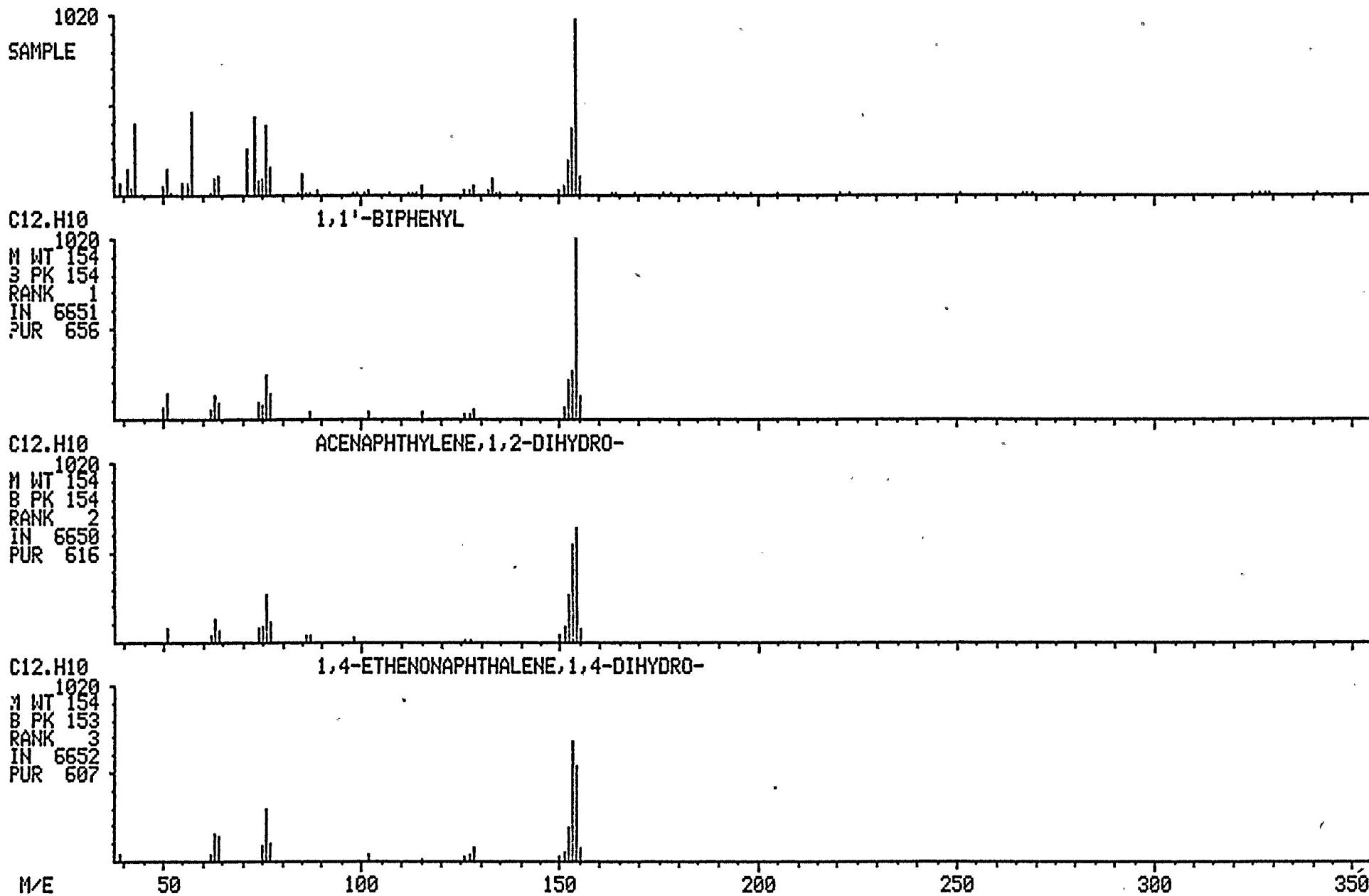
BASE M/E: 78
RIC: 55935.



LIBRARY SEARCH
05/14/81 10:06:00 + 8:01
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR5104 # 481
CALI: CAL331 # 1

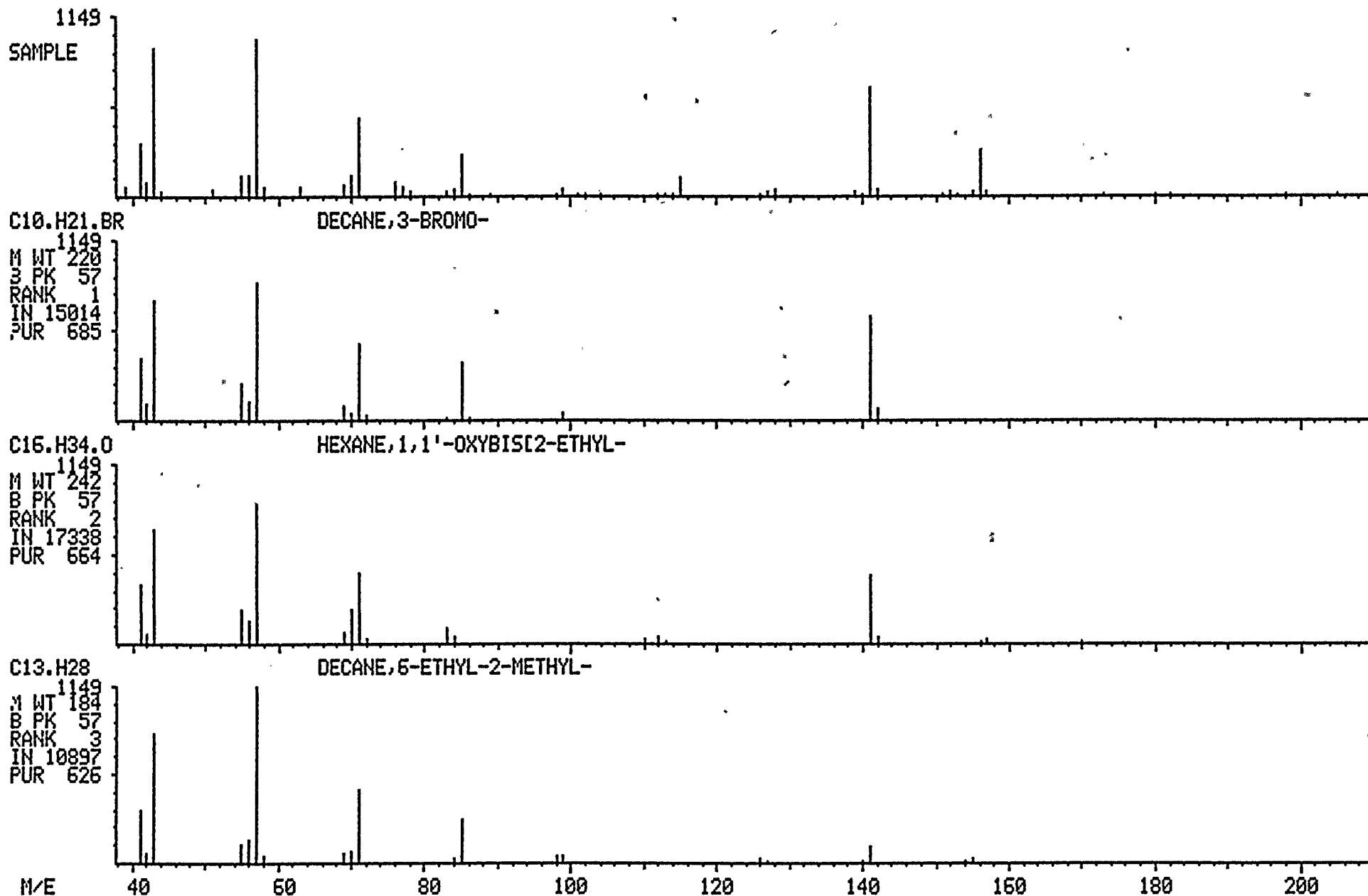
BASE M/E: 154
RIC: 17215.



LIBRARY SEARCH
05/14/81 10:06:00 + 8:10
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR5104 # 490
CALI: CAL331 # 1

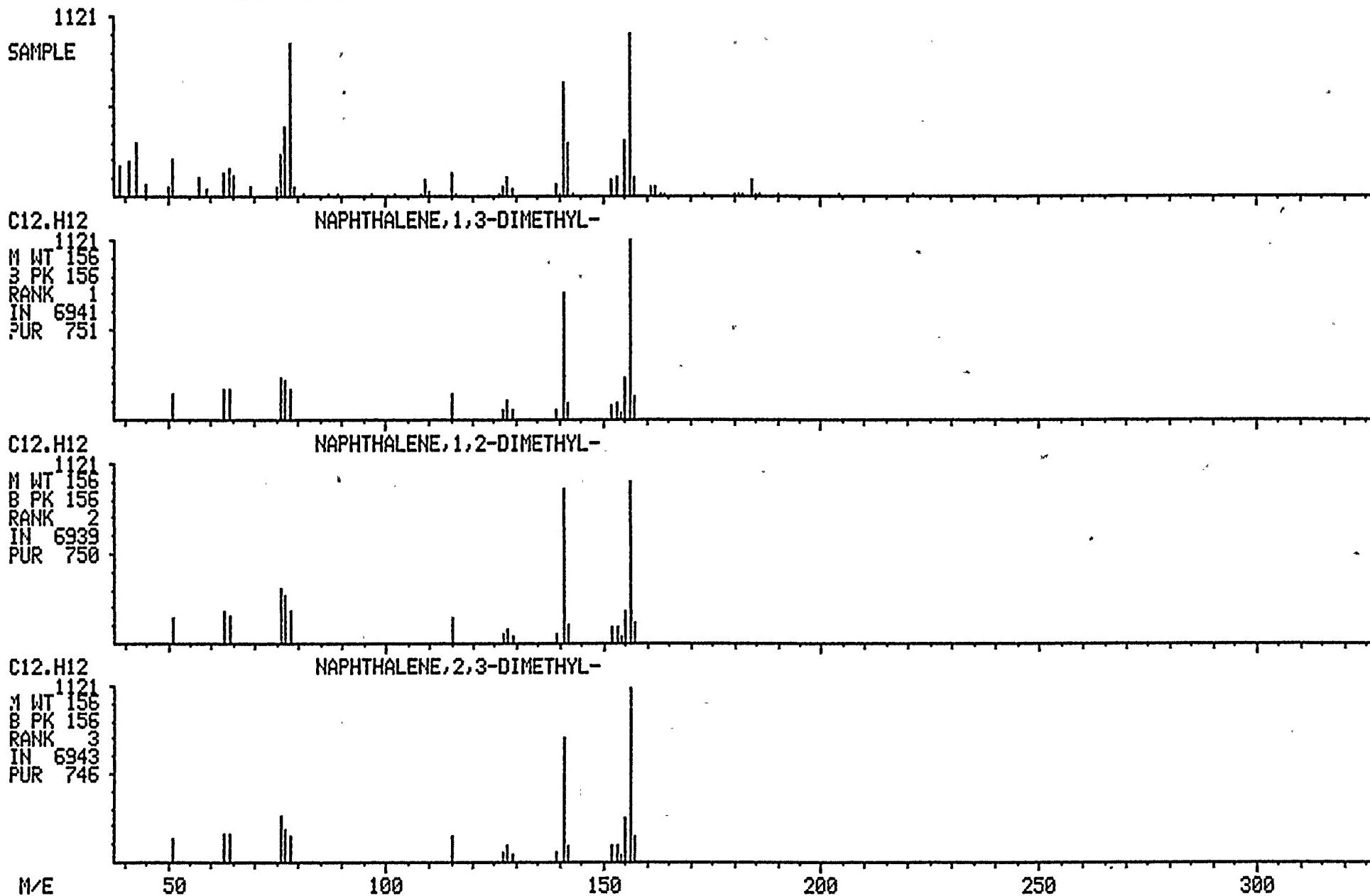
BASE M/E: 57
RIC: 21535.



LIBRARY SEARCH
05/14/81 10:06:00 + 8:15
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 495
CALI: CAL331 # 1

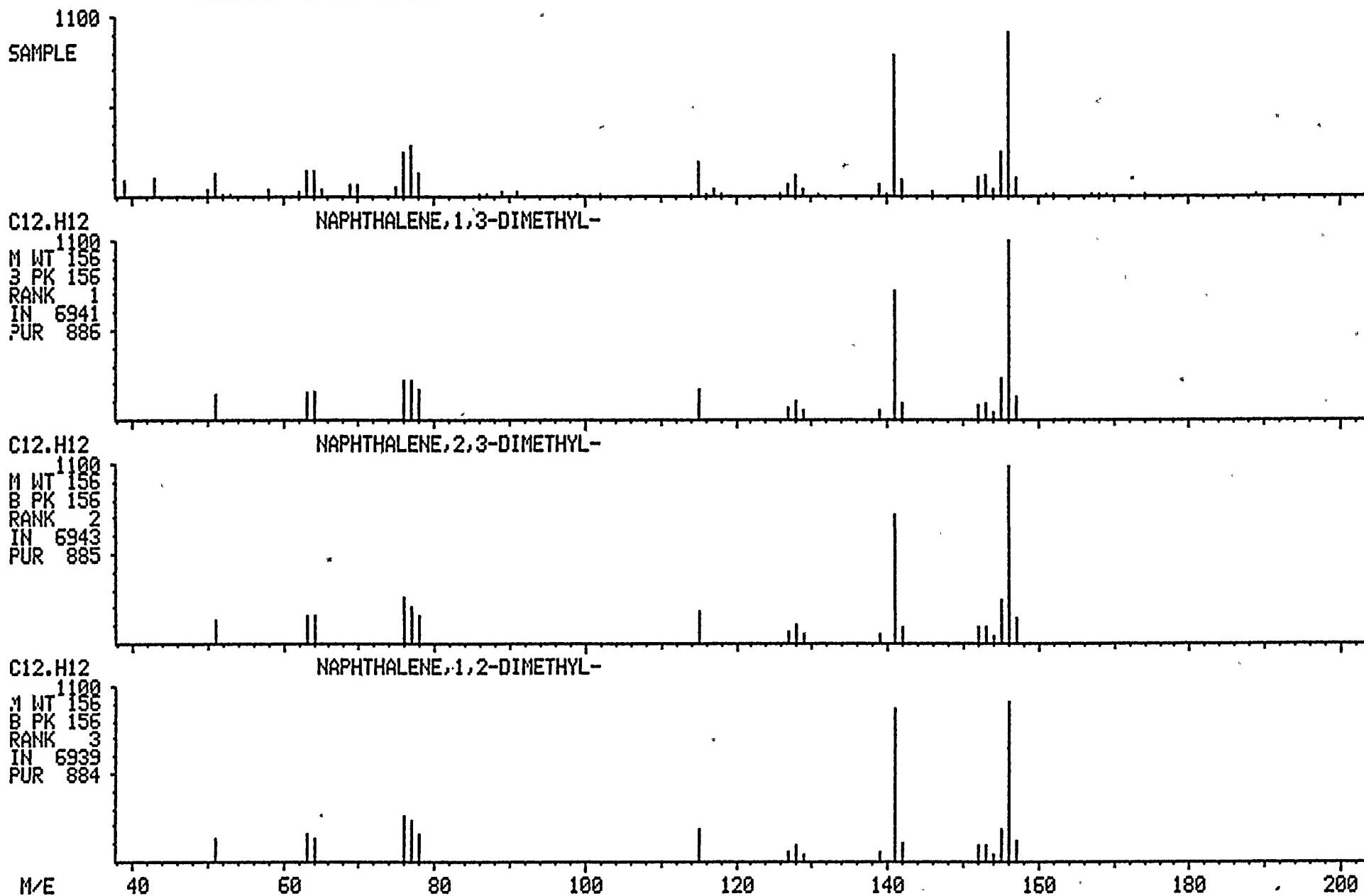
BASE M/E: 156
RIC: 26271.



LIBRARY SEARCH
05/14/81 10:06:00 + 8:21
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 501
CALI: CAL331 # 1

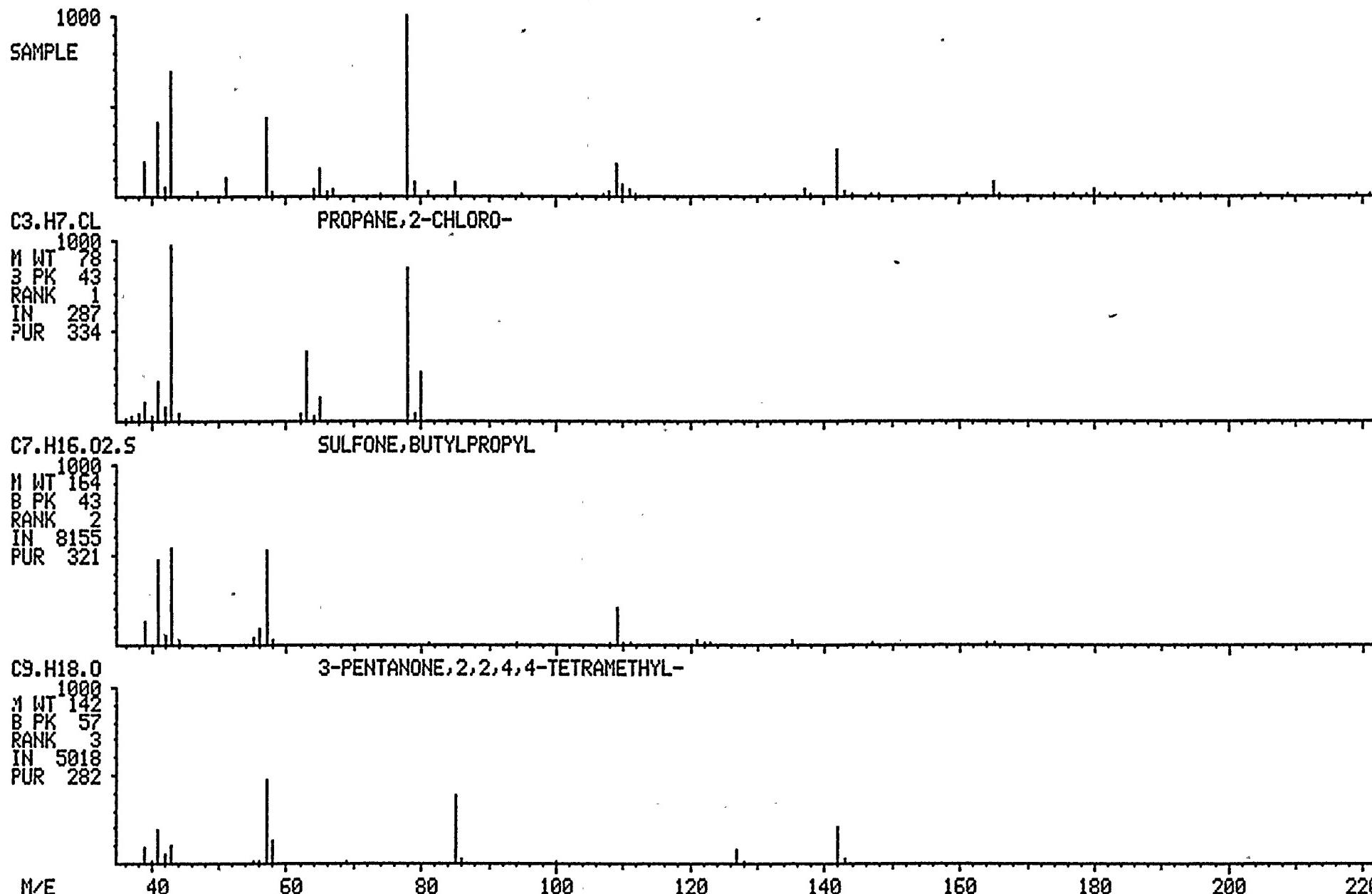
BASE M/E: 156
RIC: 23071.



LIBRARY SEARCH
05/14/81 10:06:00 + 8:34
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

DATA: SR51Q4 # 514
CALI: CAL331 # 1

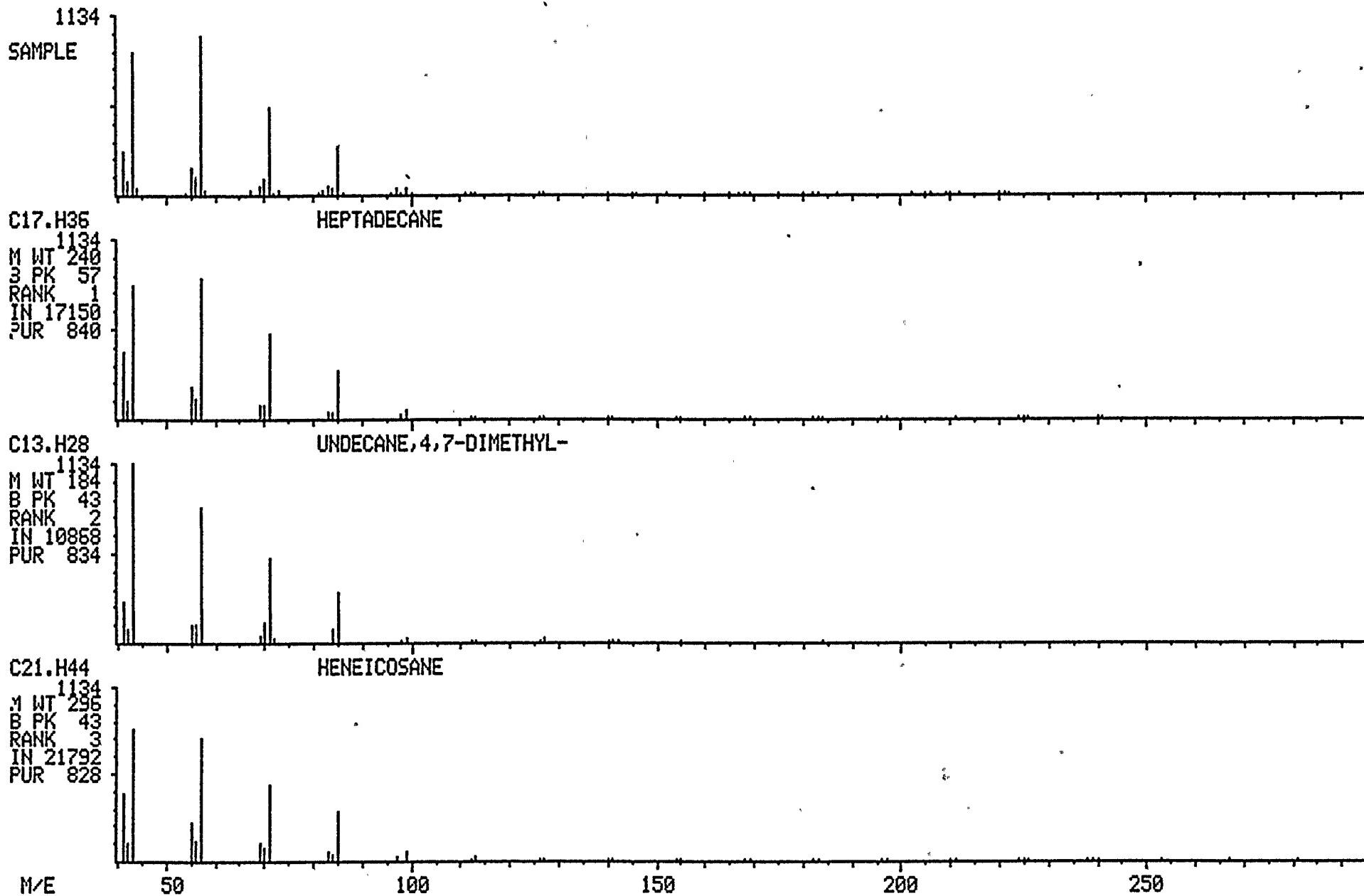
BASE M/E: 78
RIC: 18751.



LIBRARY SEARCH
05/14/81 10:06:00 + 8:
SAMPLE: Q4
ENHANCED (S 158 2N 0T)

DATA: SR51Q4 # 529
CALI: CAL331 # 1

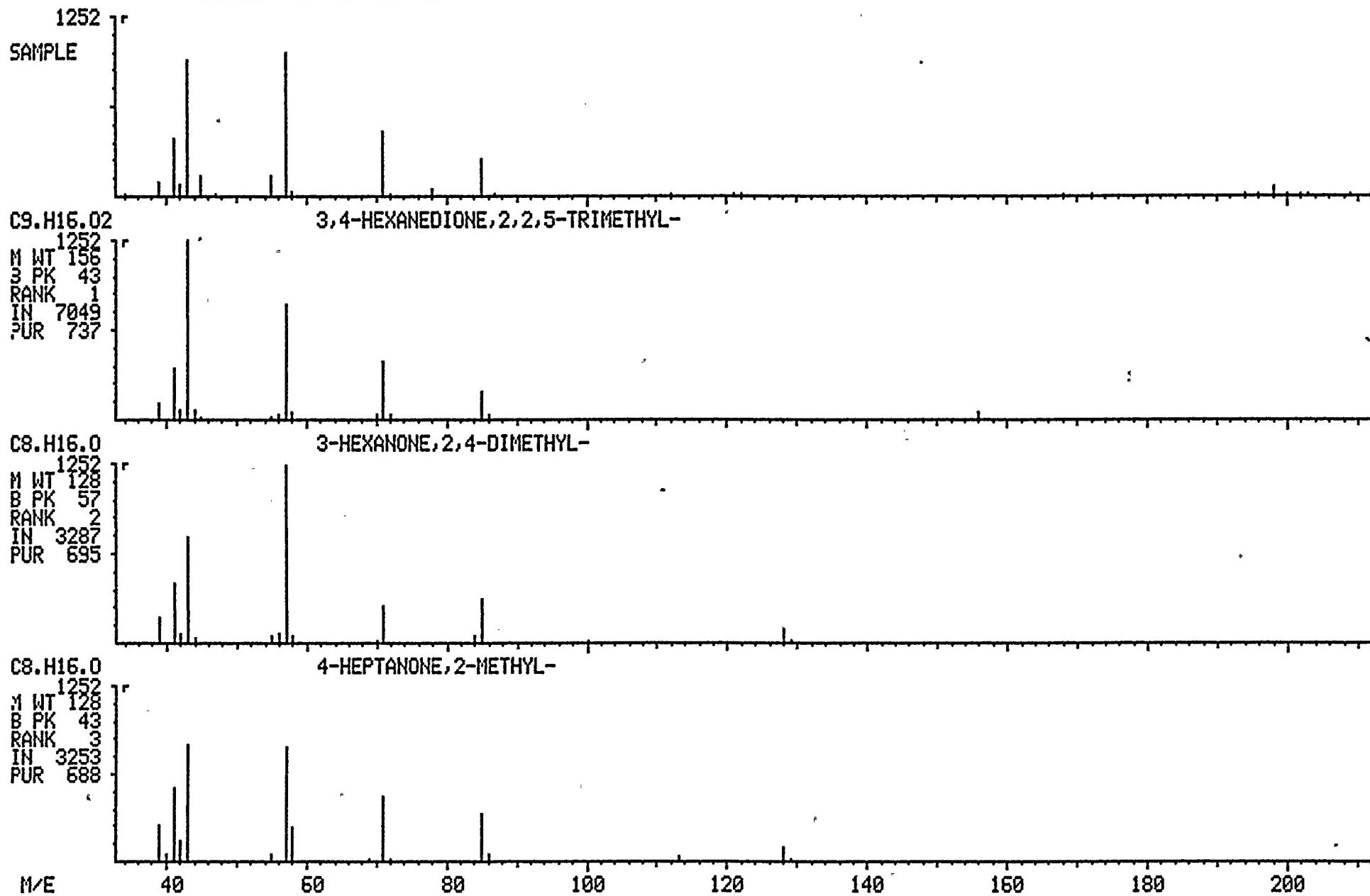
BASE N/E: 57
RIC: 14911.



LIBRARY SEARCH
05/14/81 10:06:00 + 8:54
SAMPLE: Q4
ENHANCED (S 15B 2N 0T)

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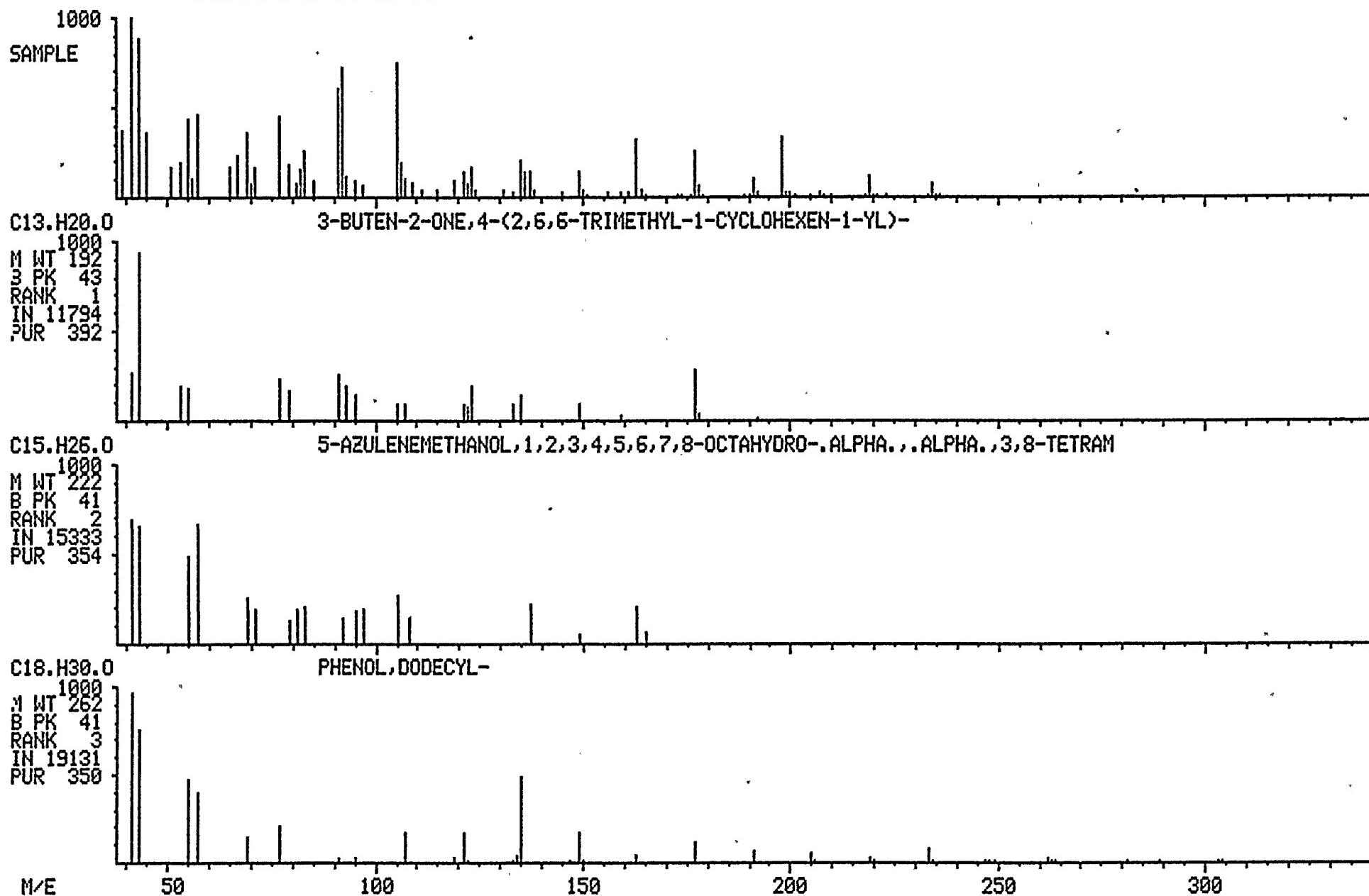
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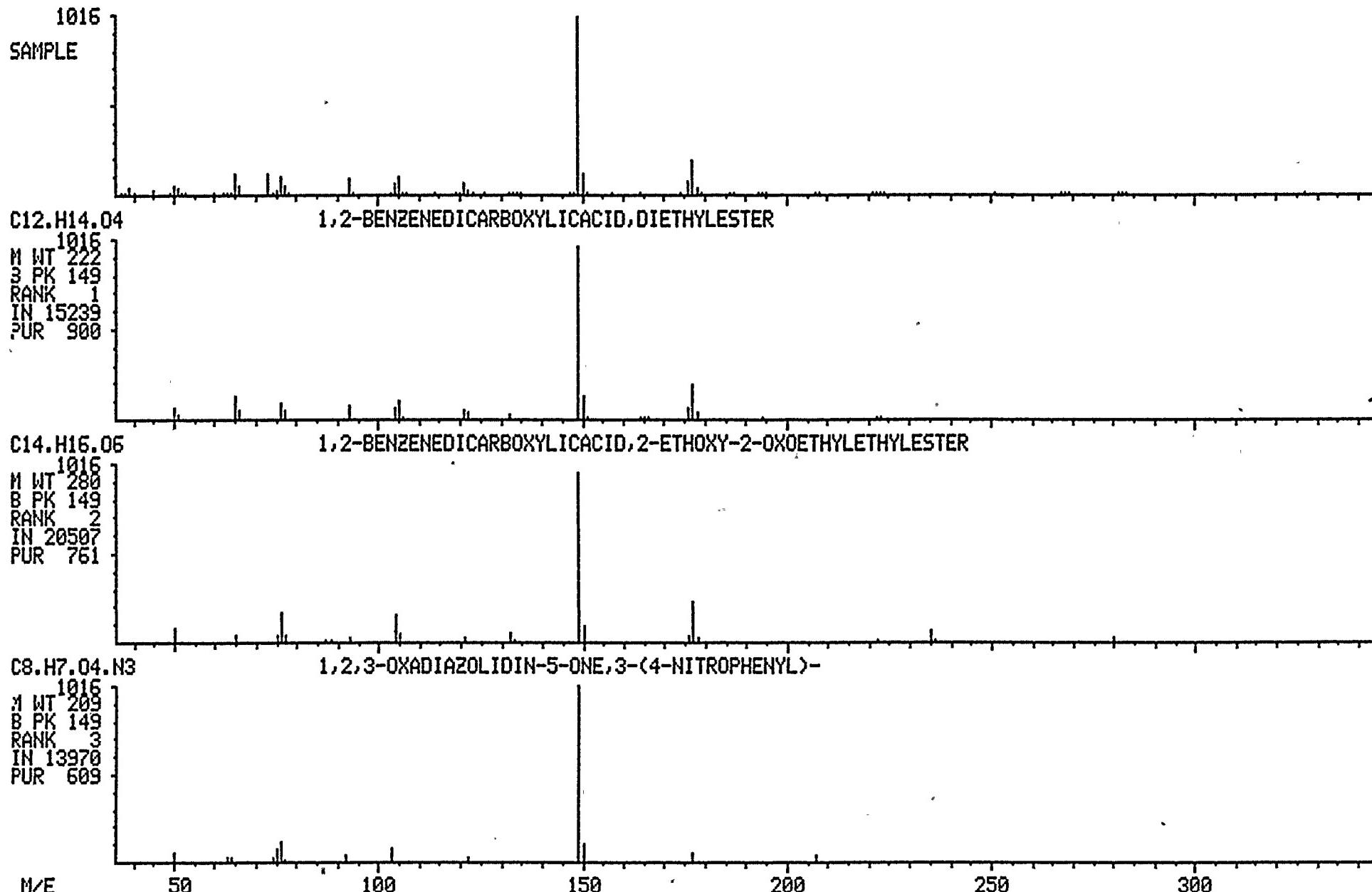
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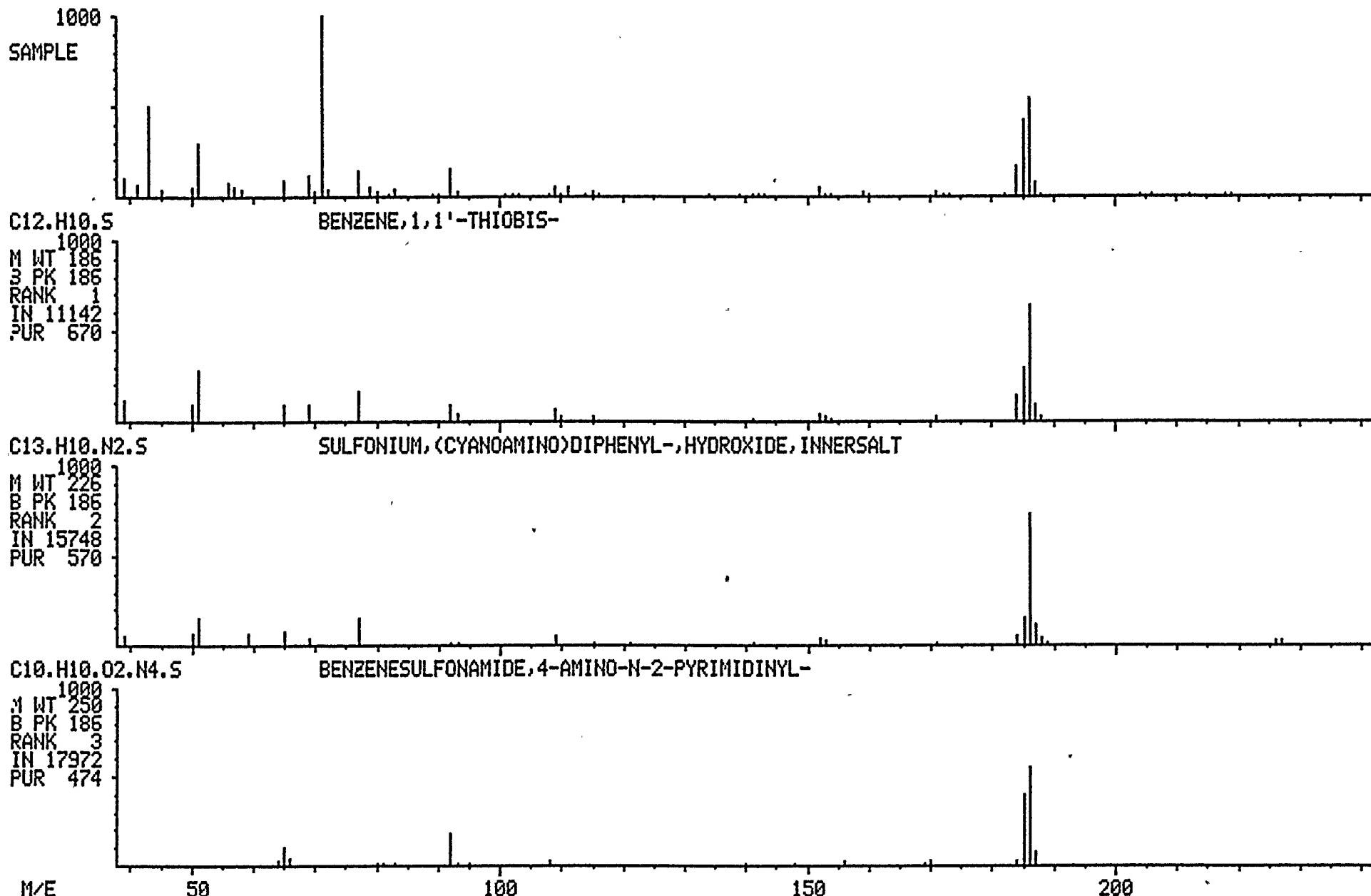
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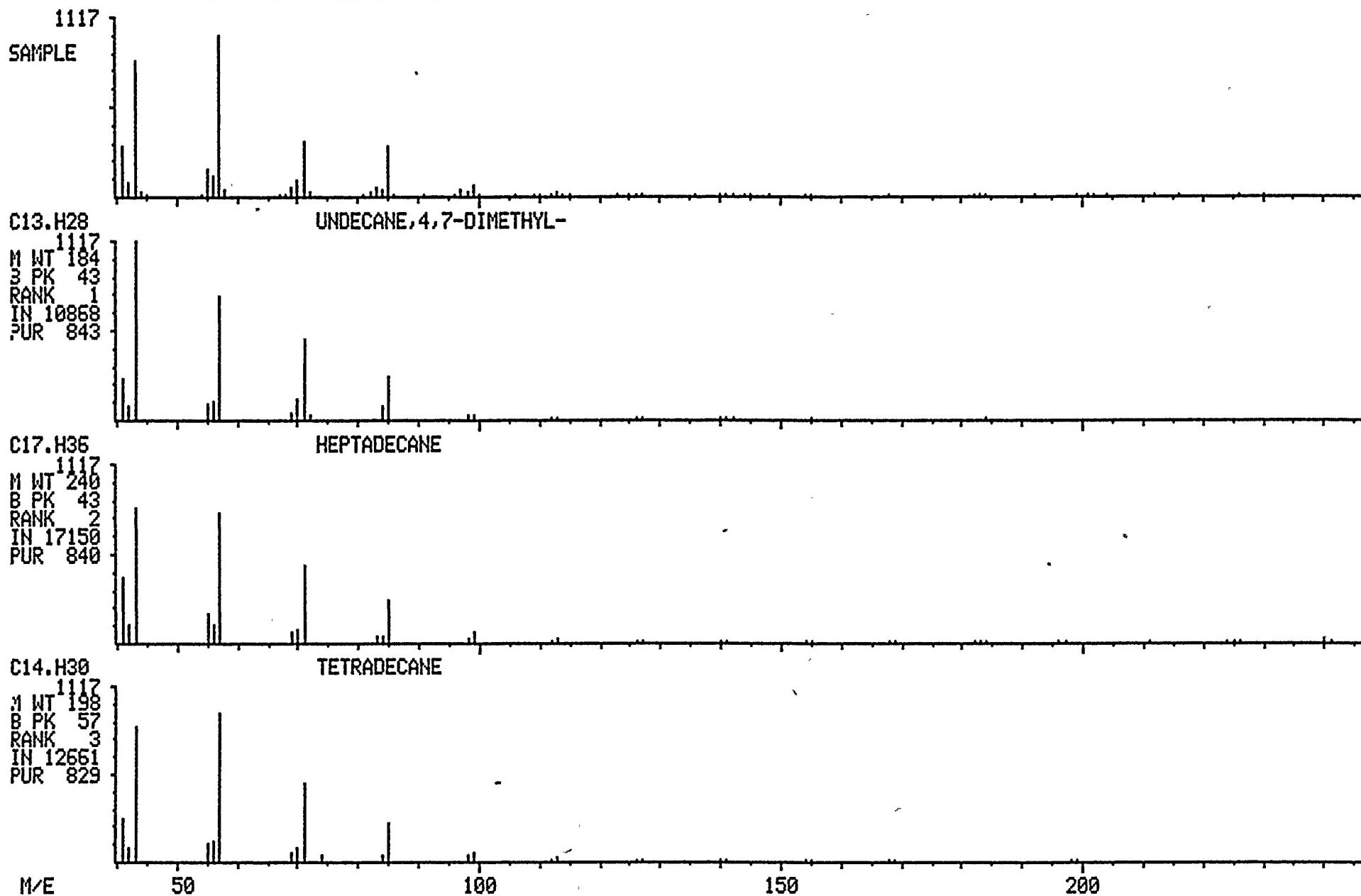
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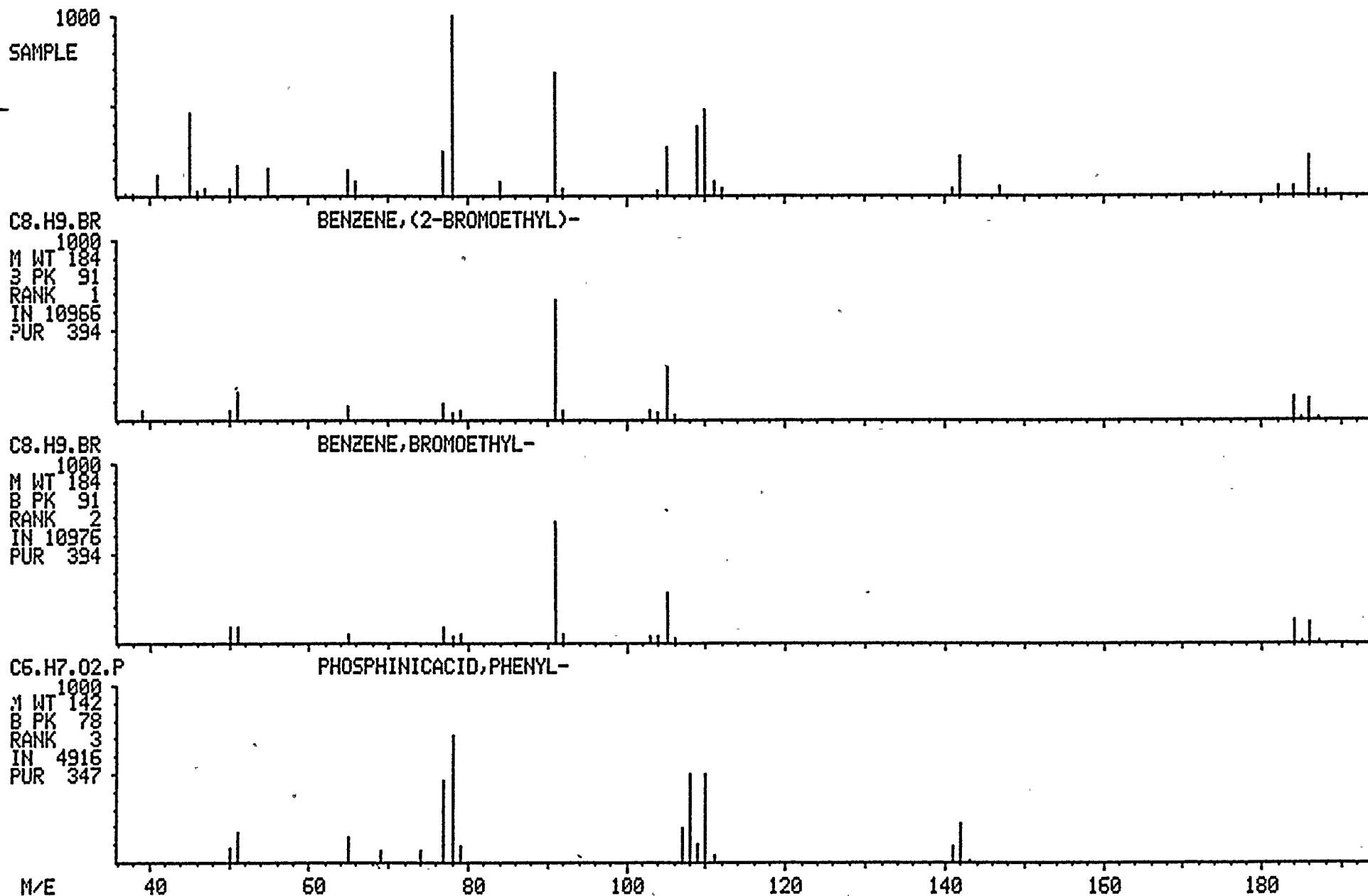
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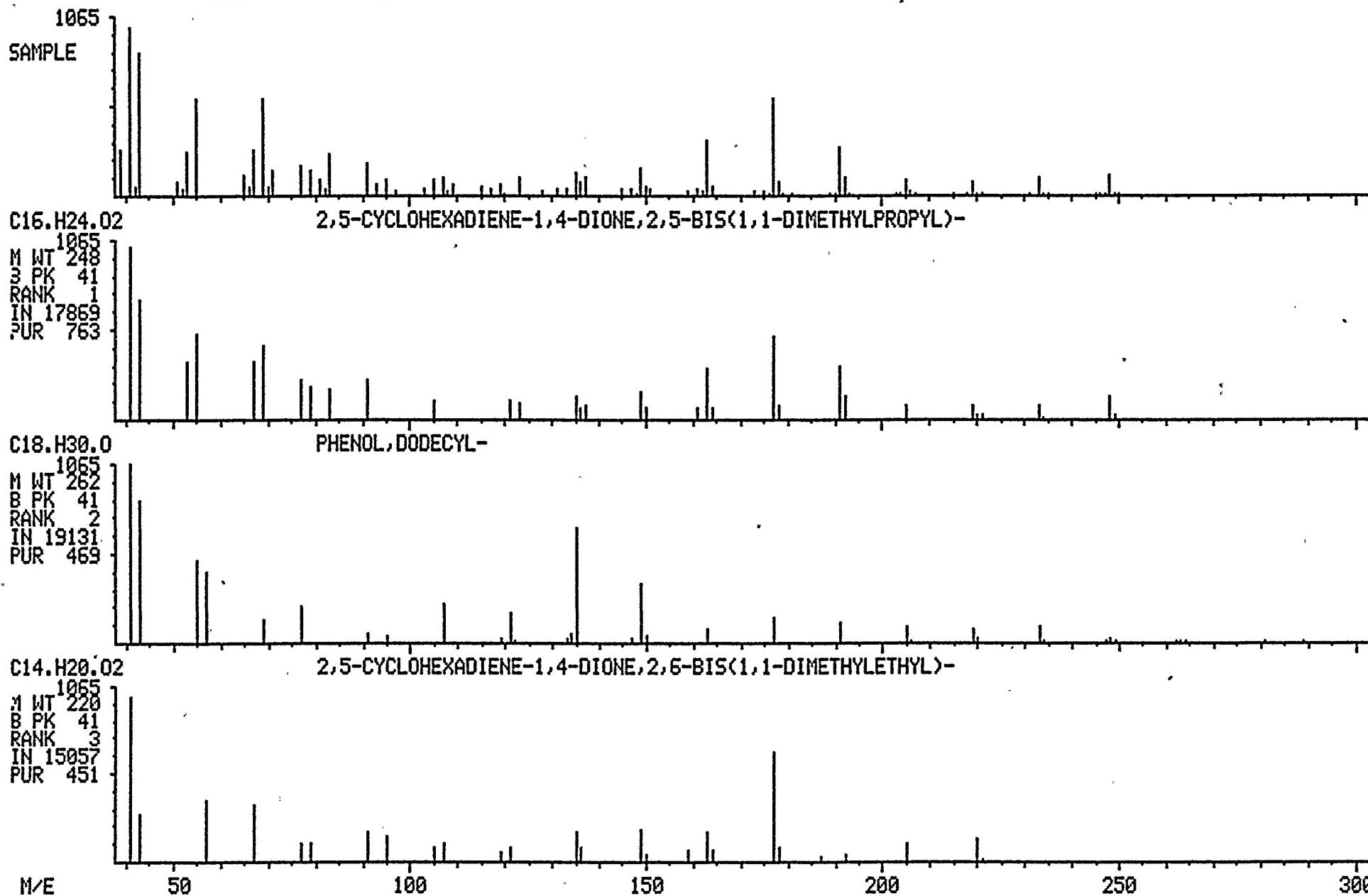
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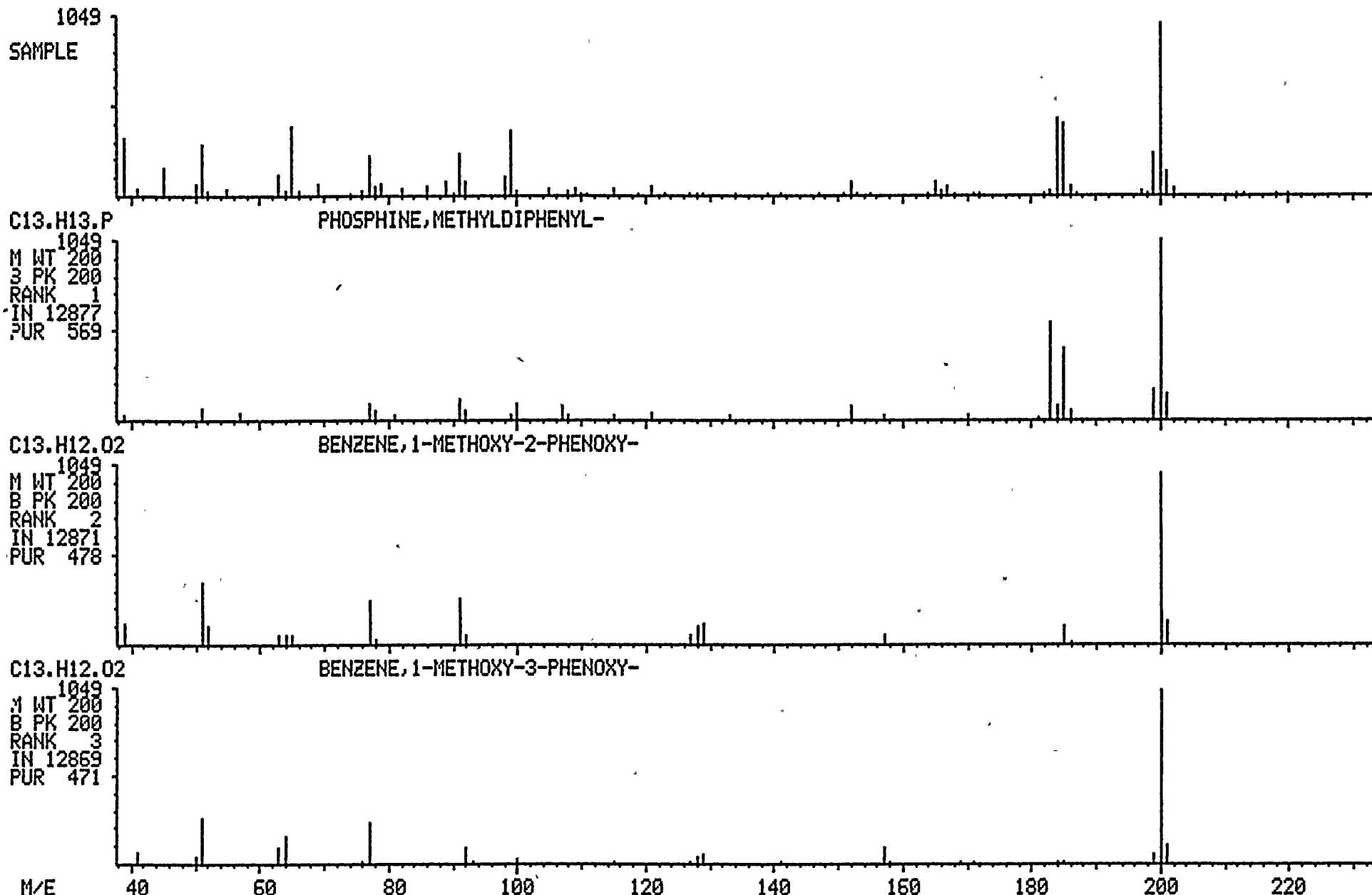
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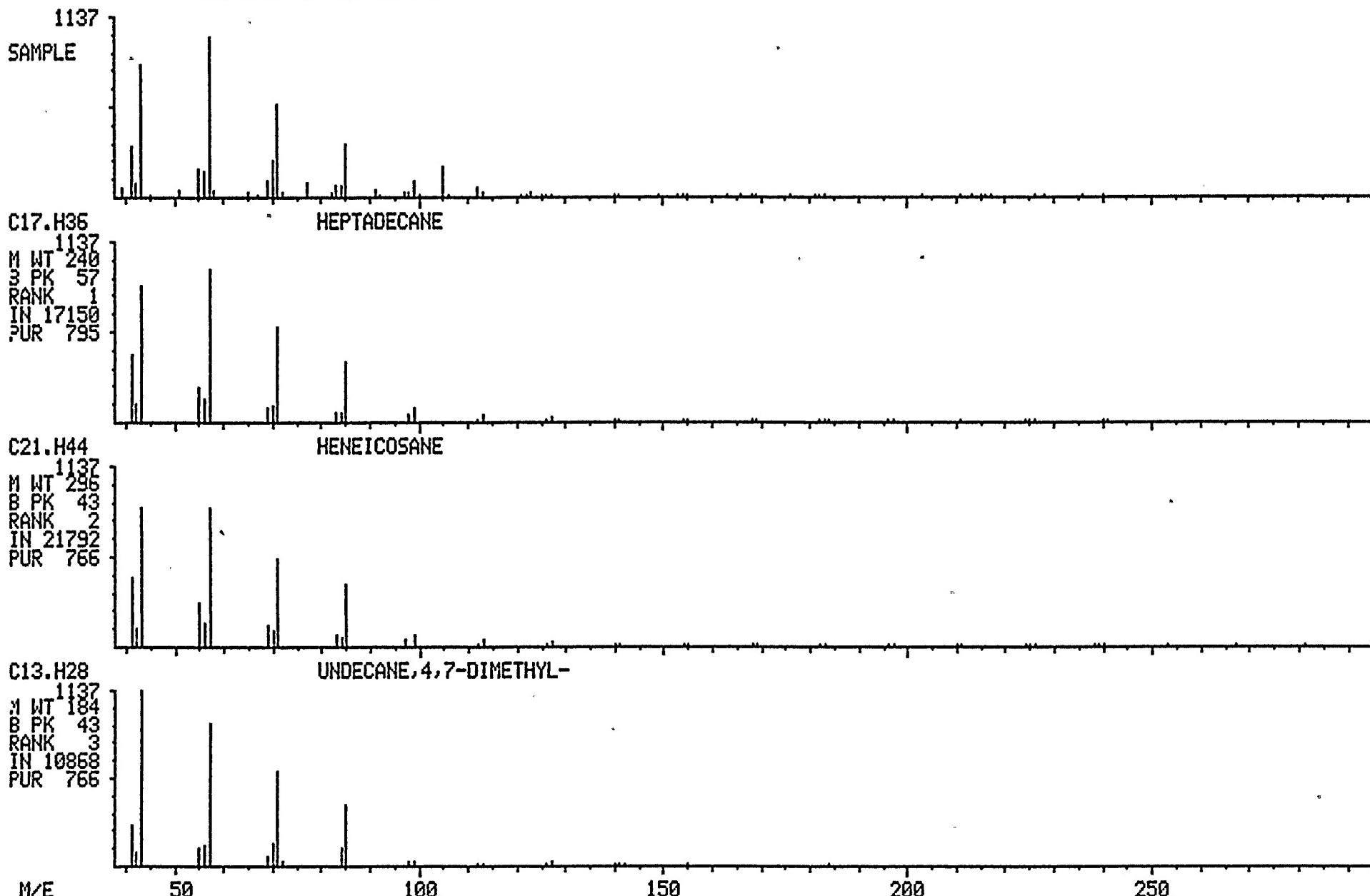
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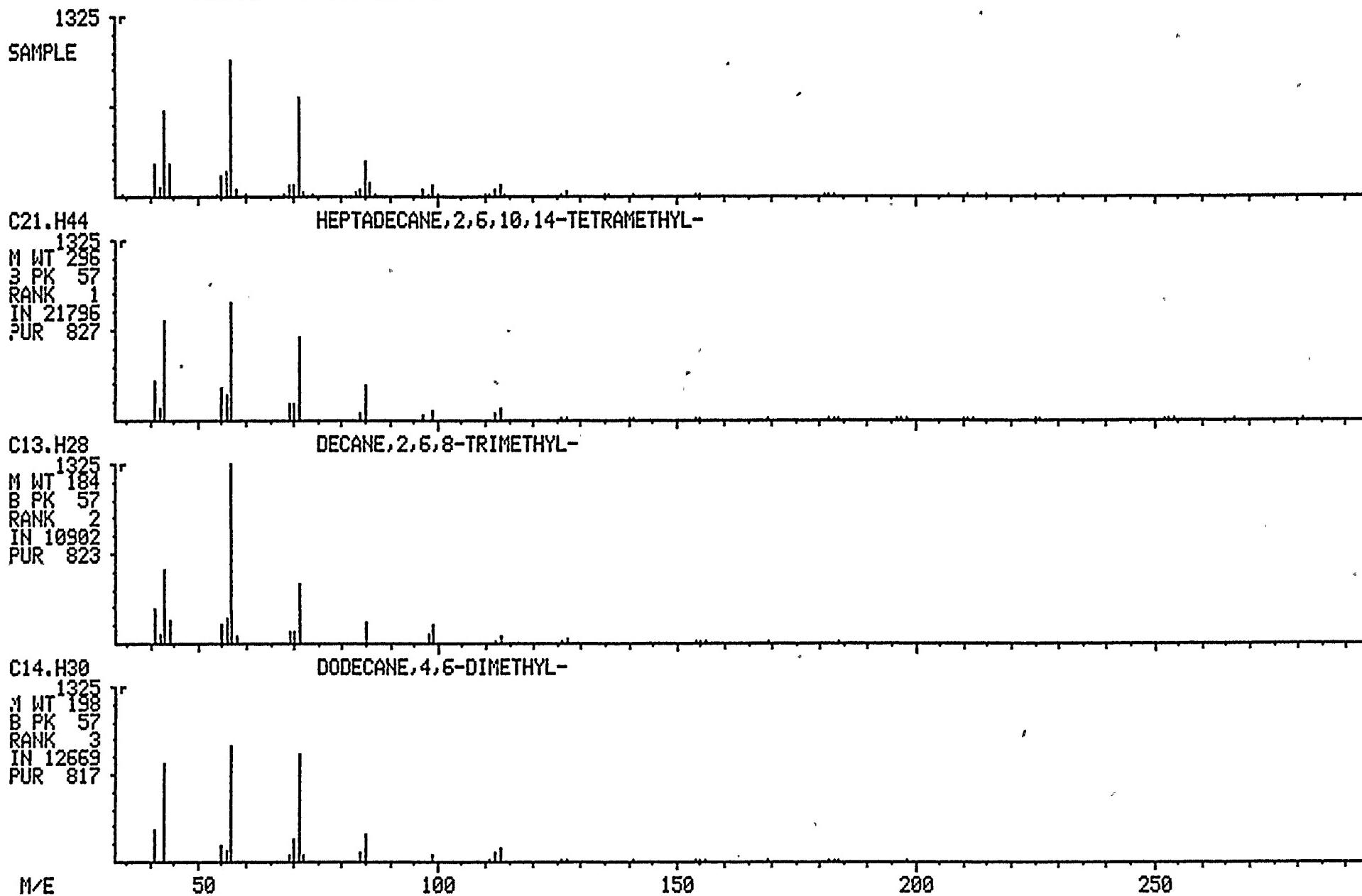
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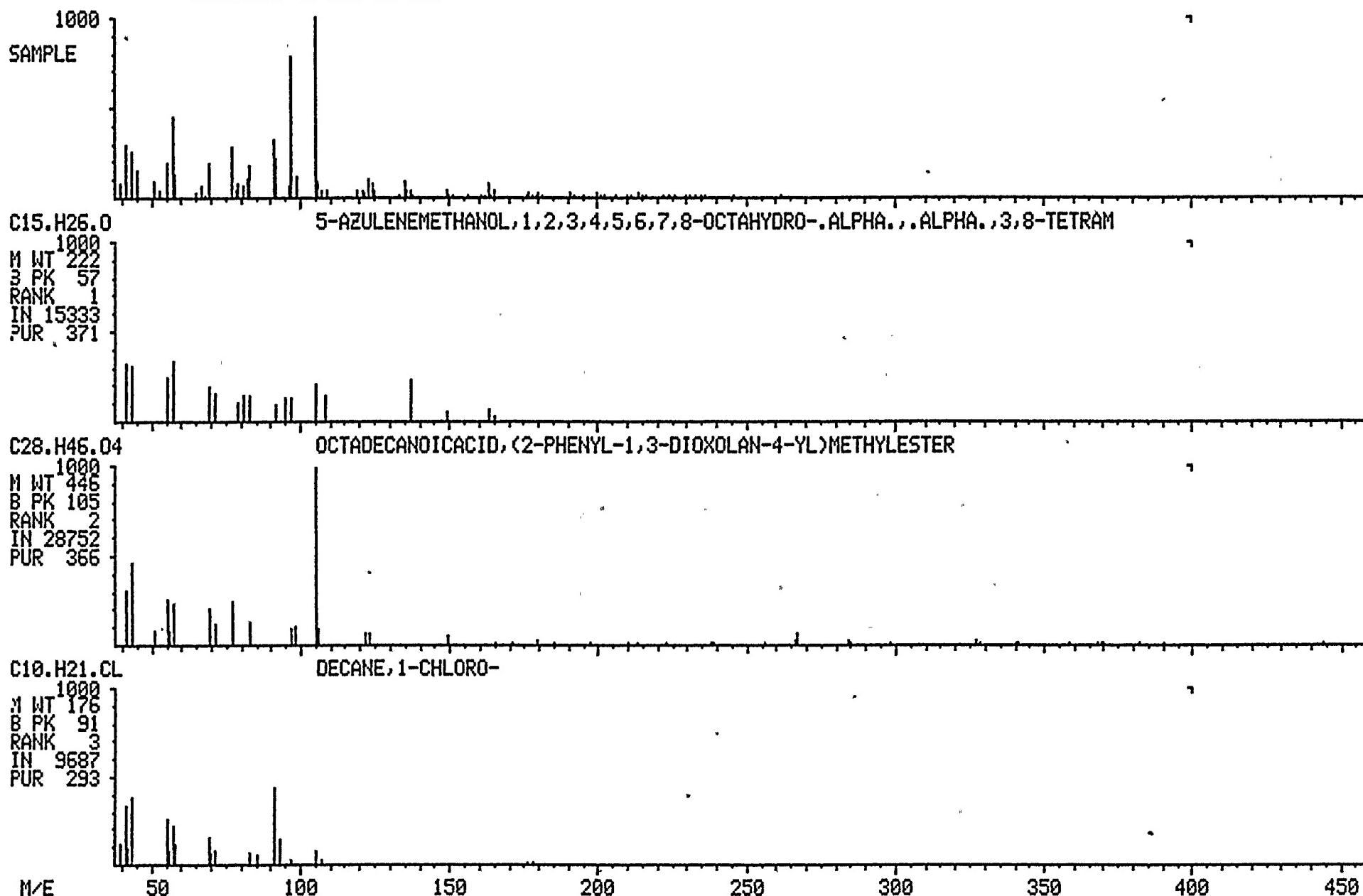
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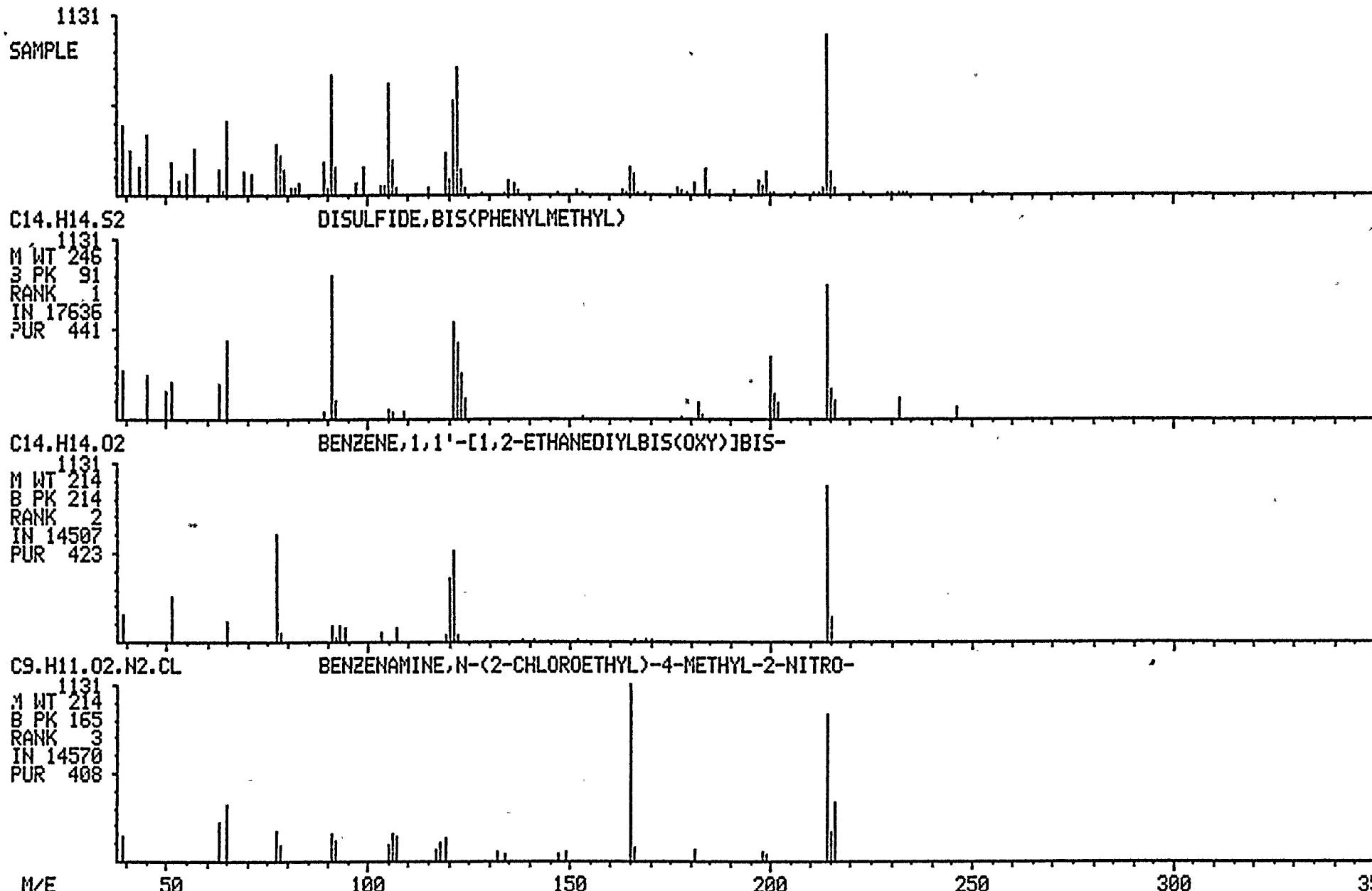
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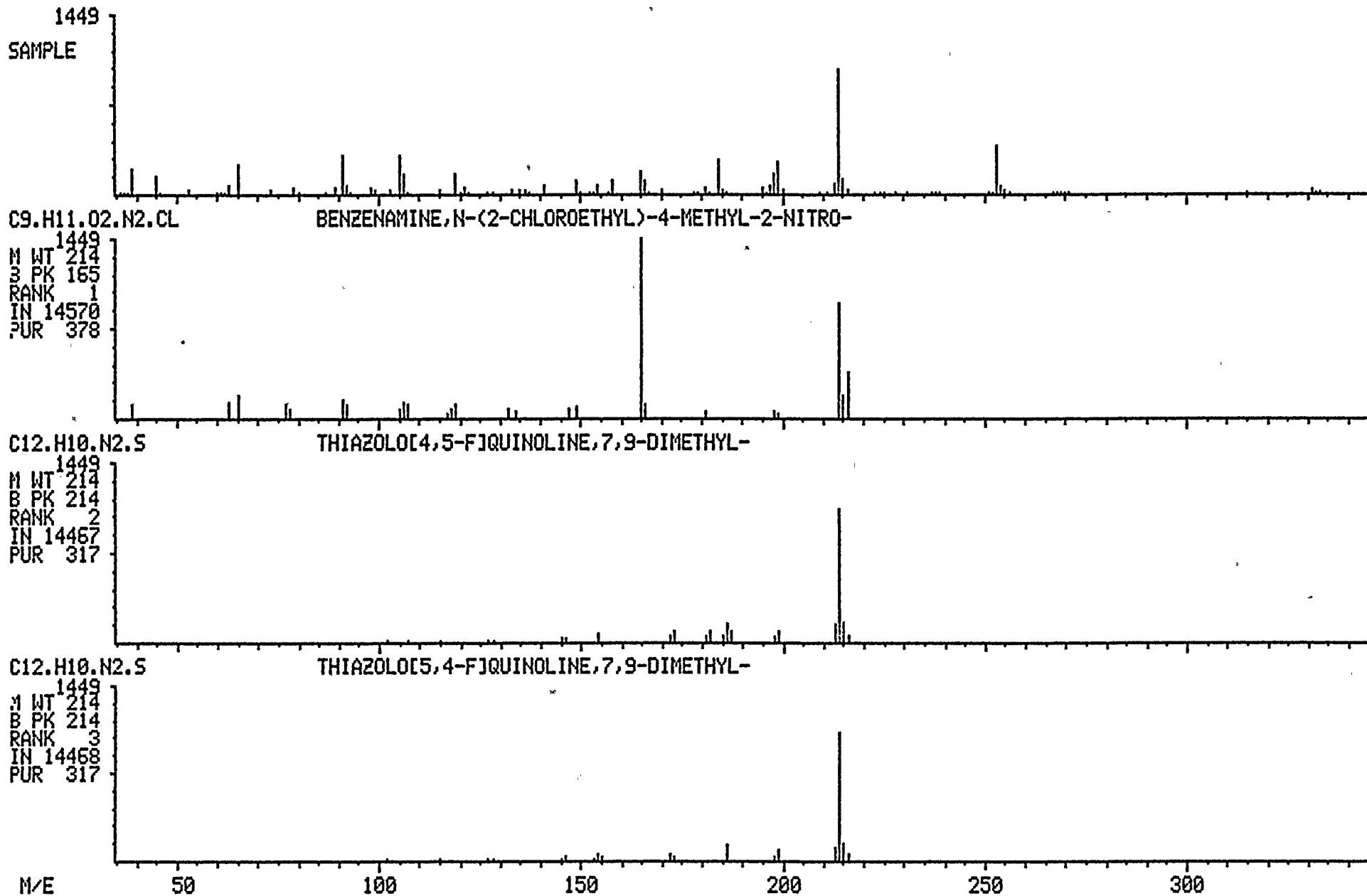
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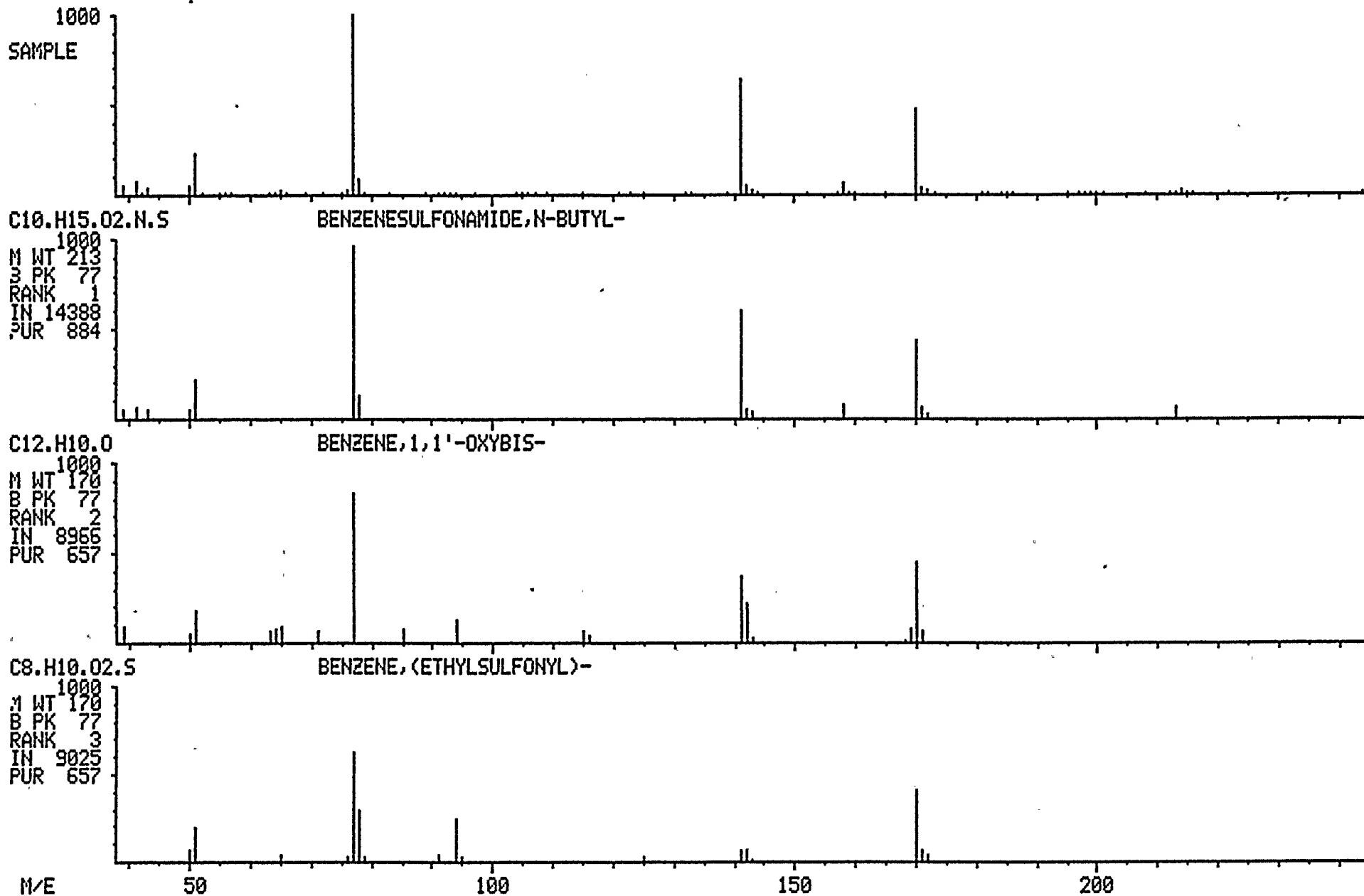
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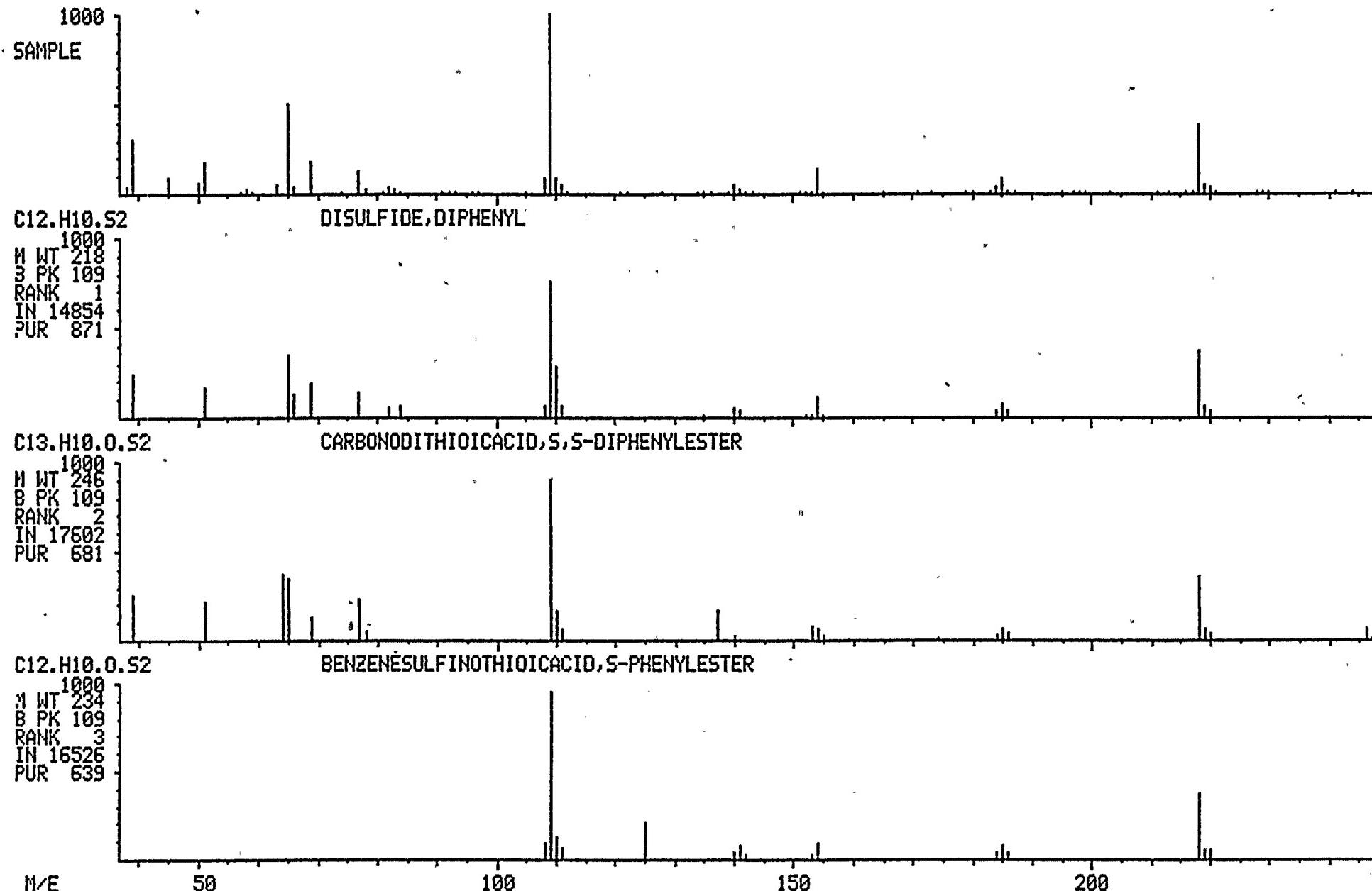
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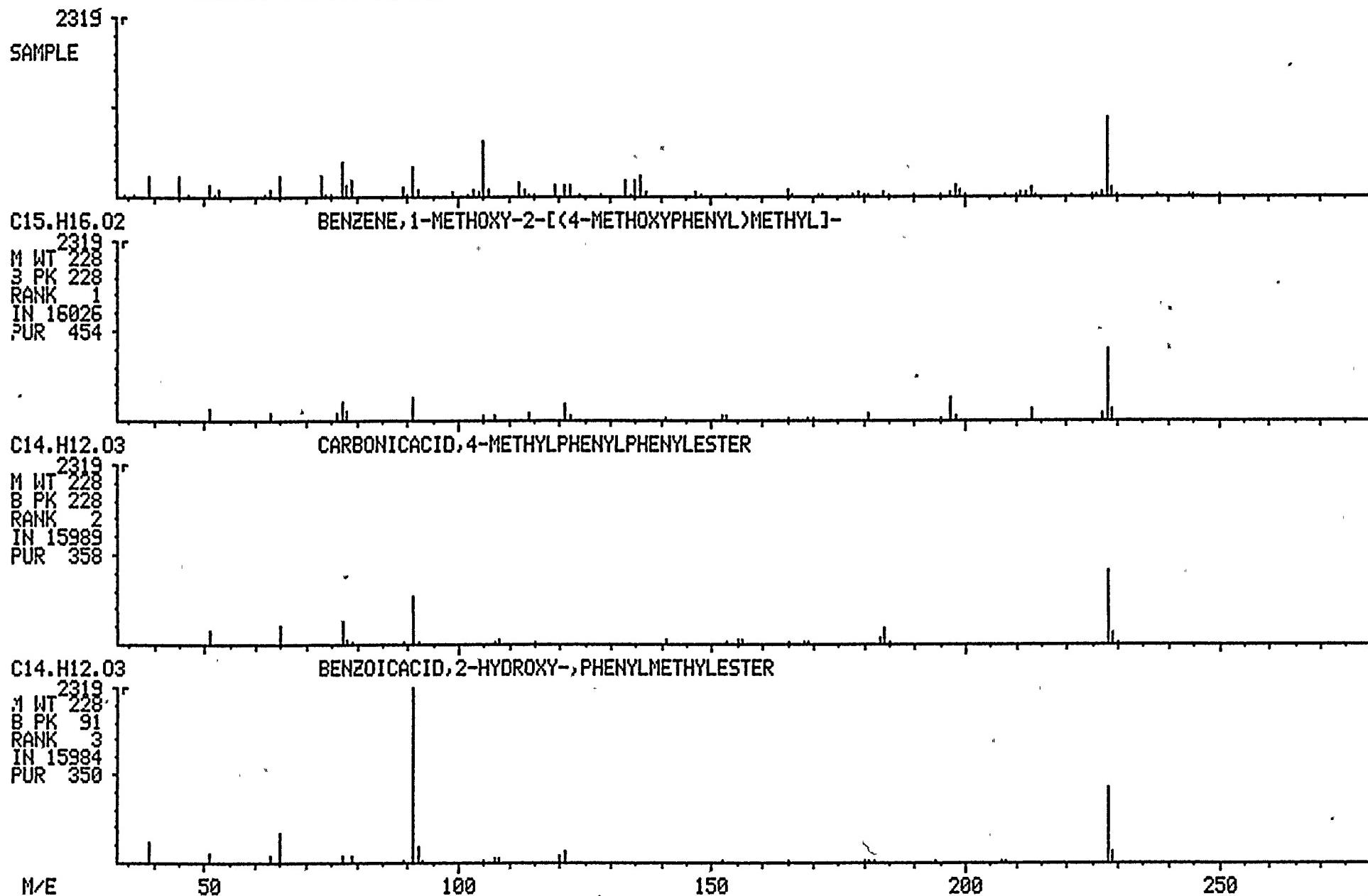
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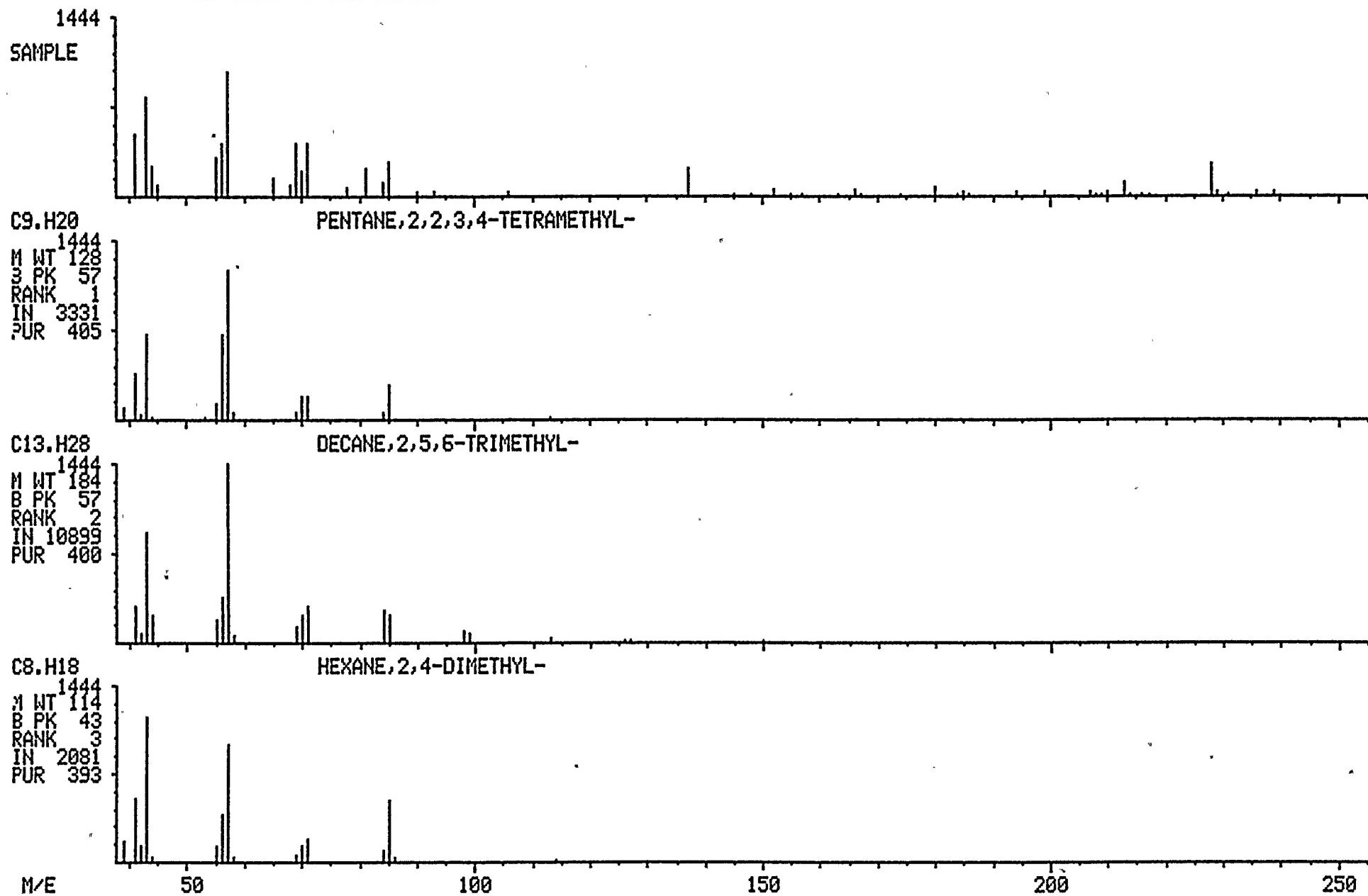
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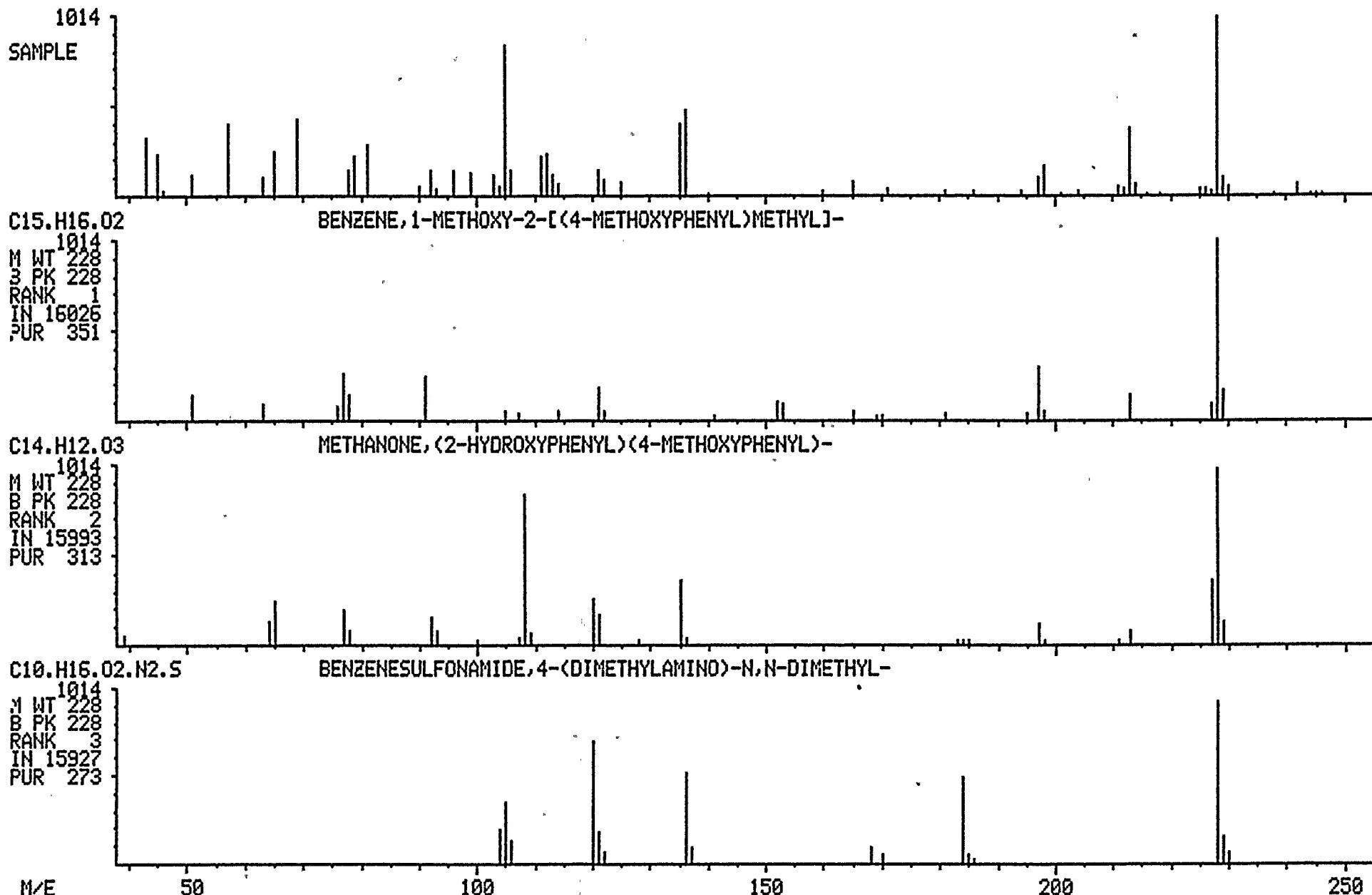
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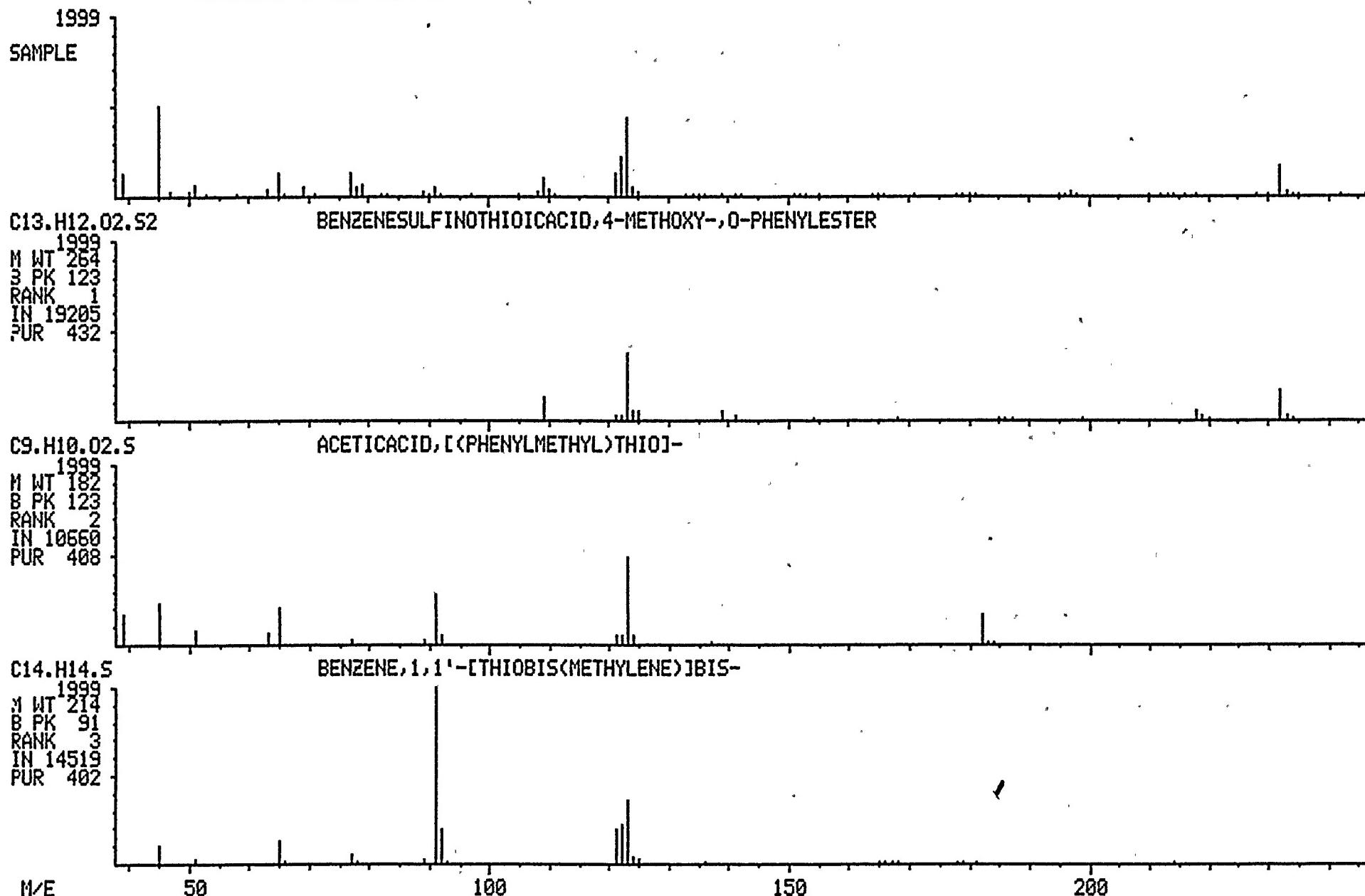
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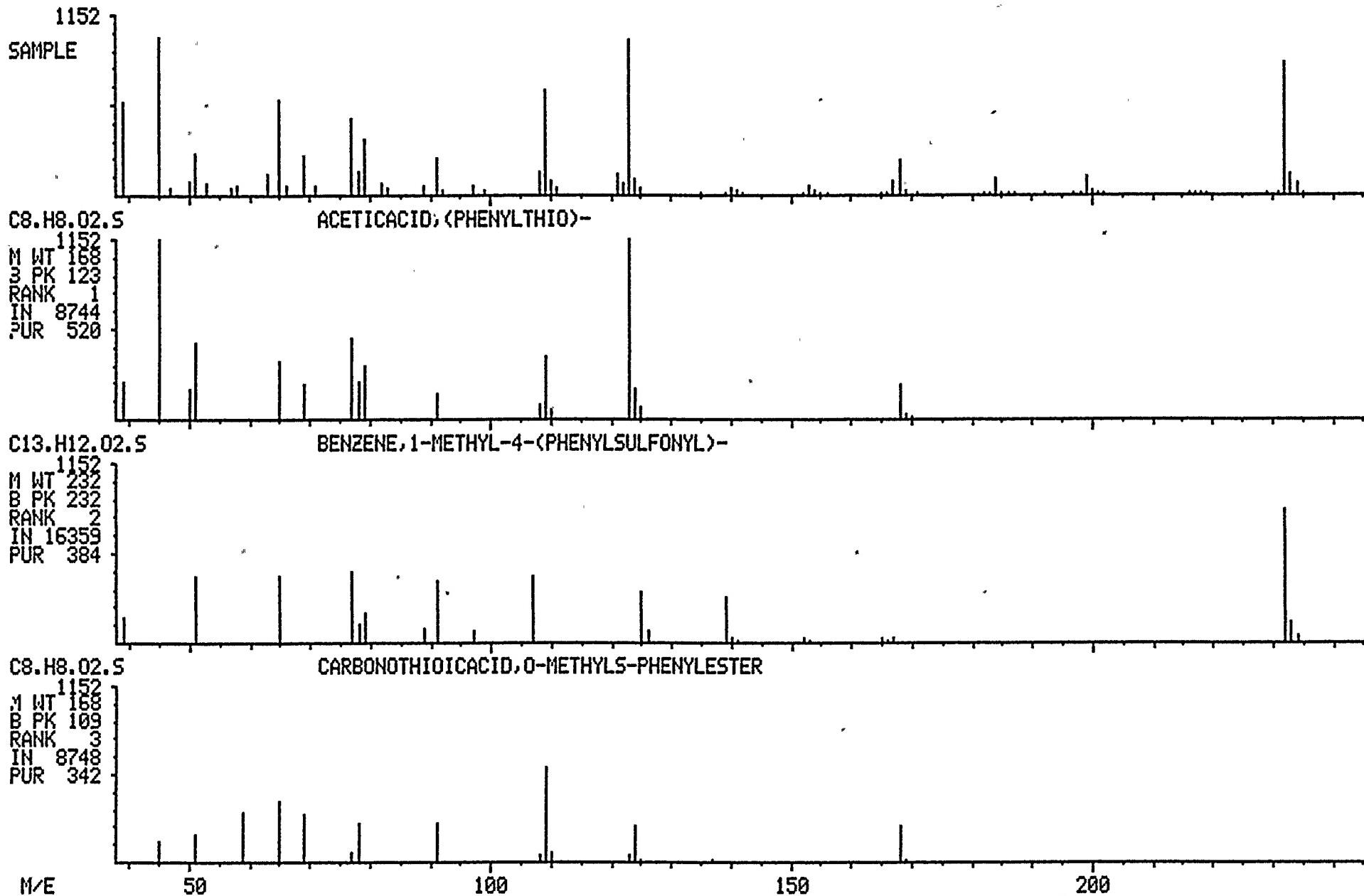
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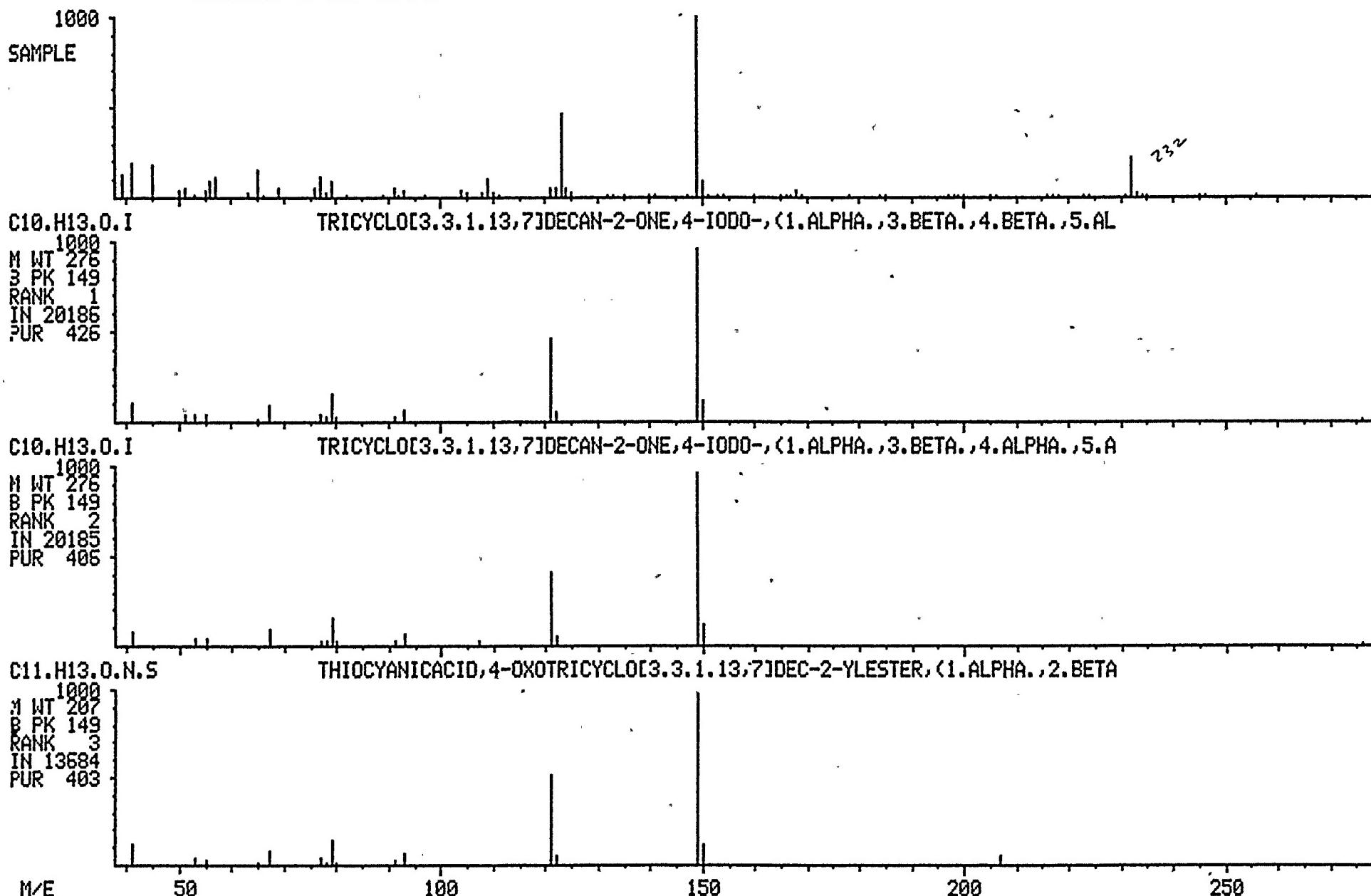
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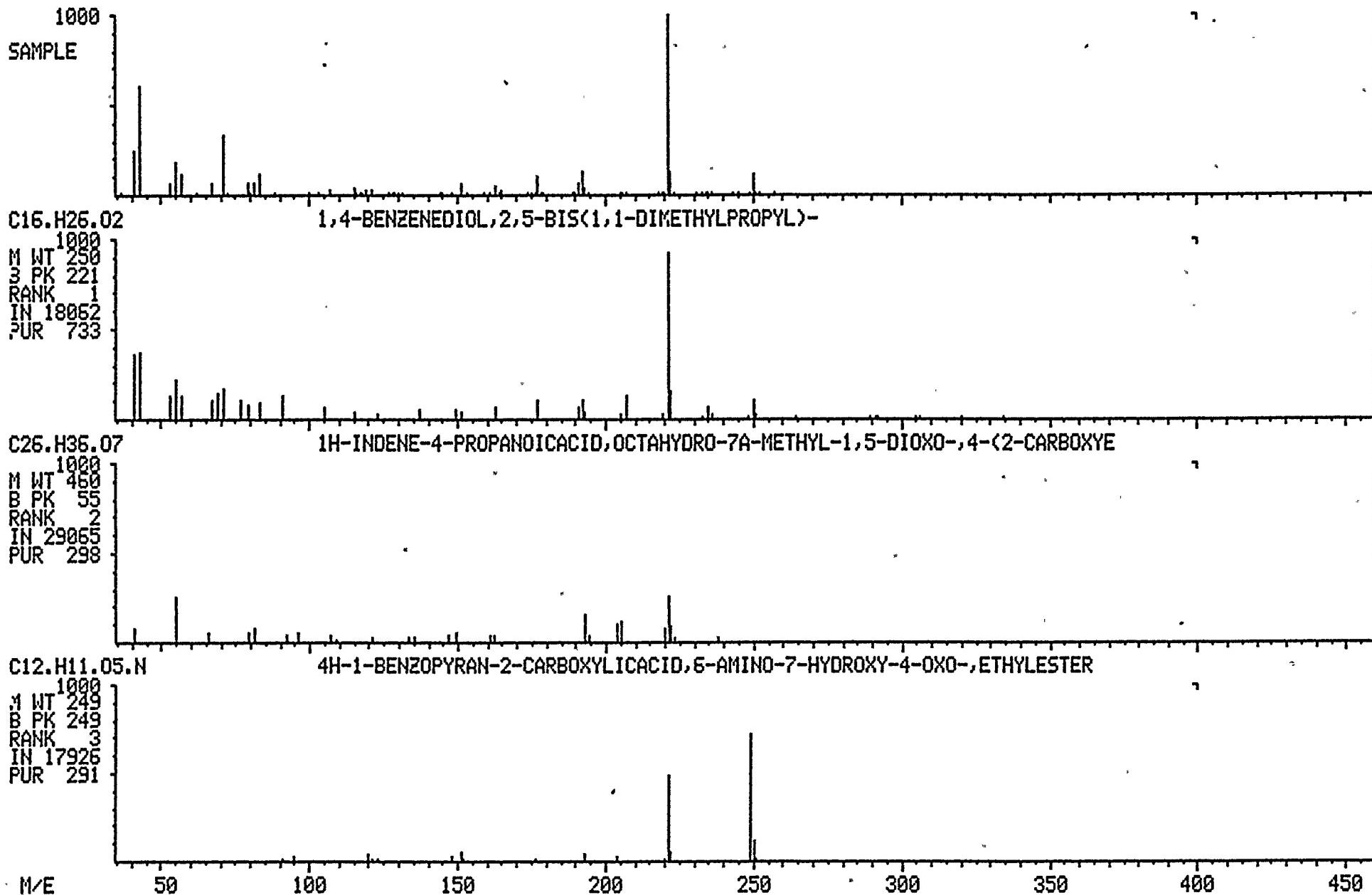
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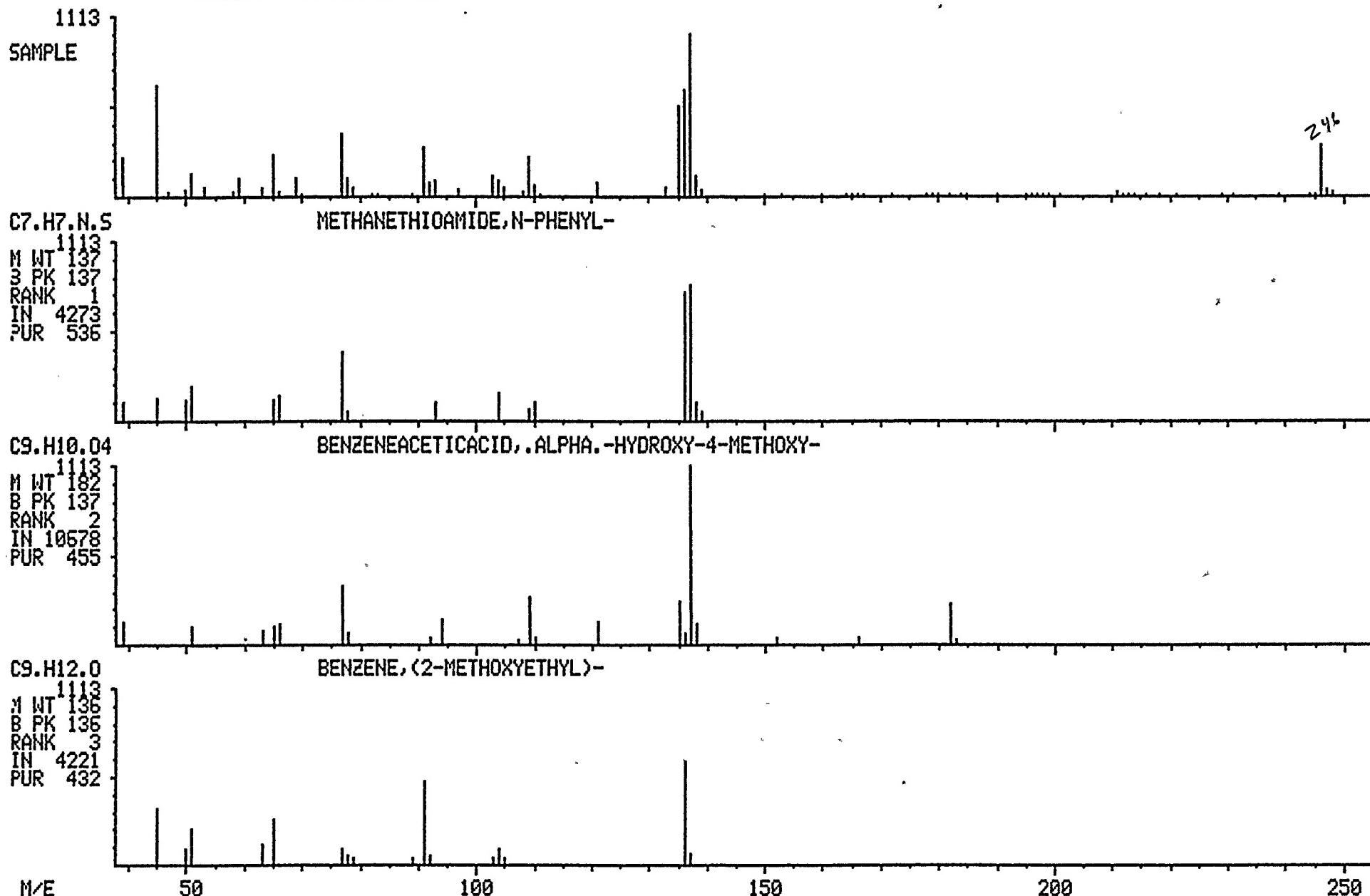
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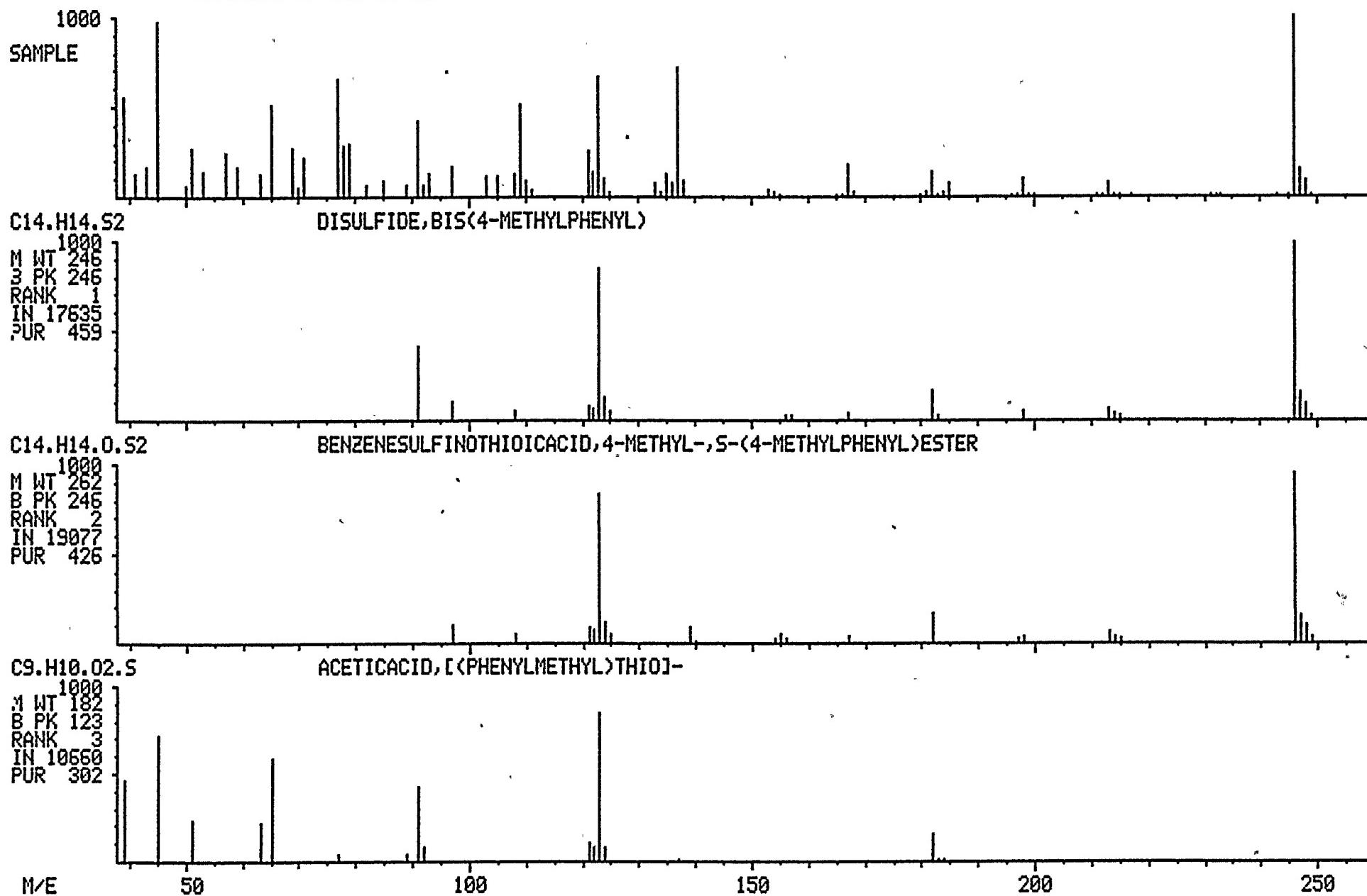
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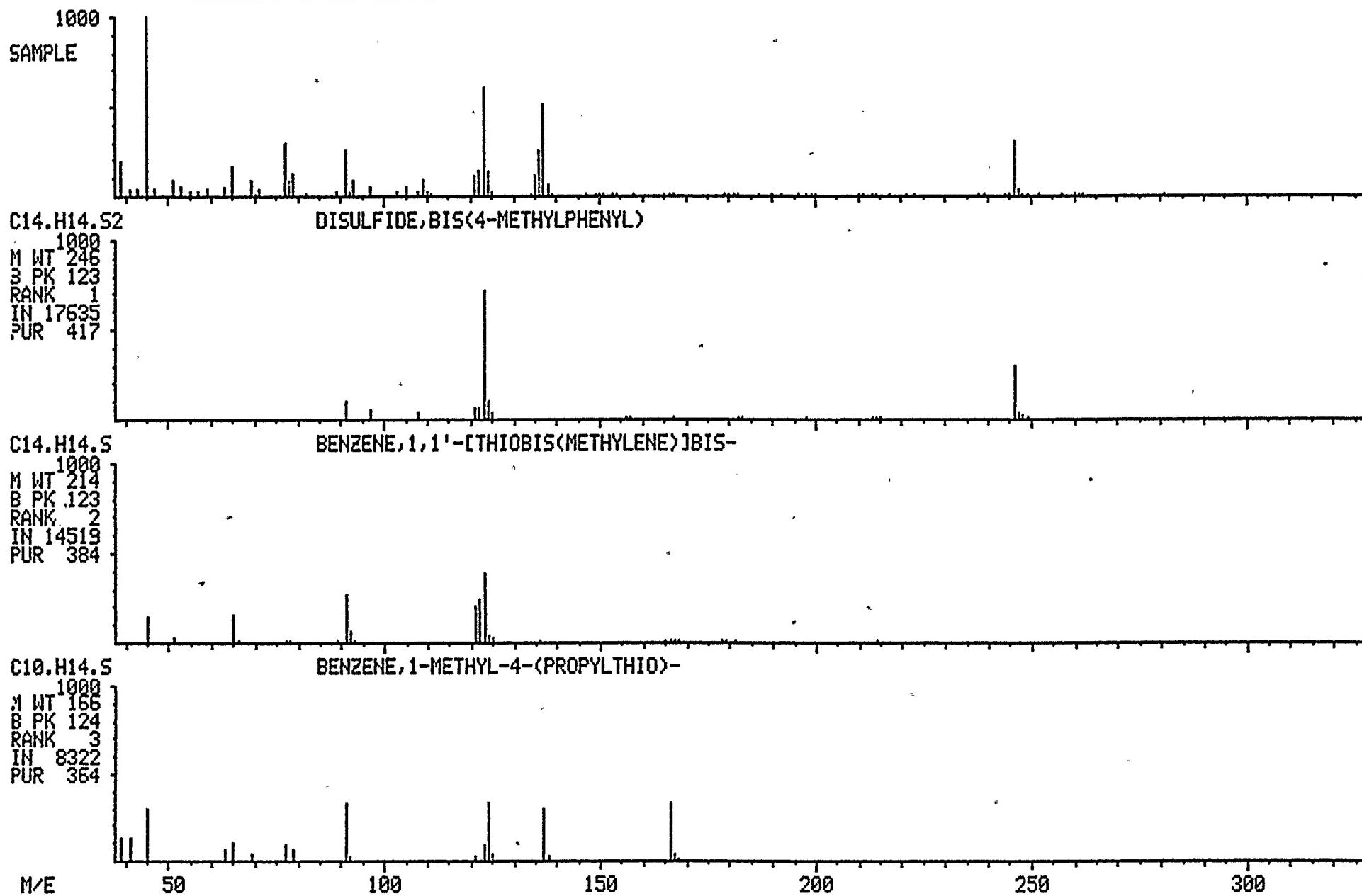
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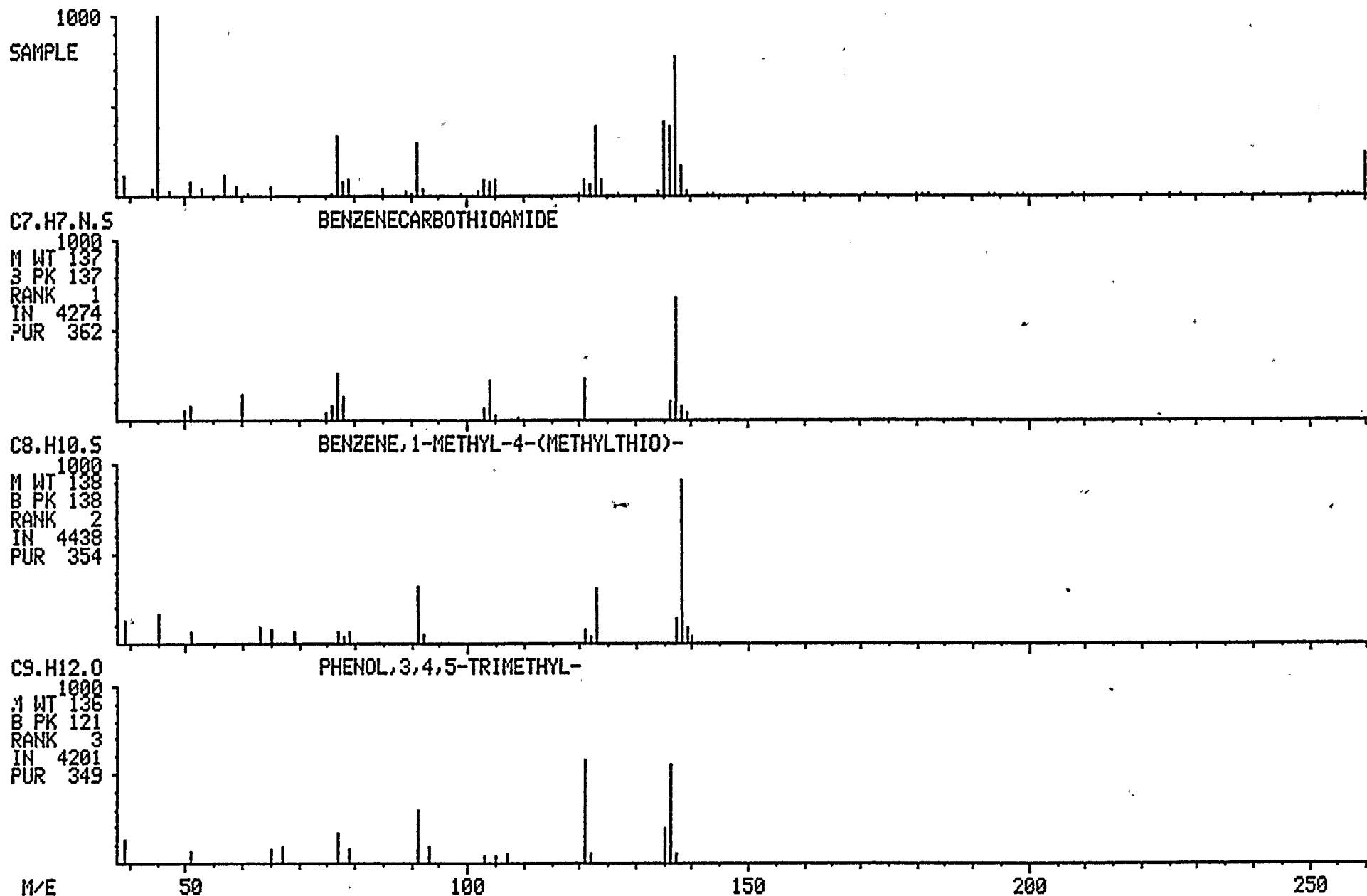
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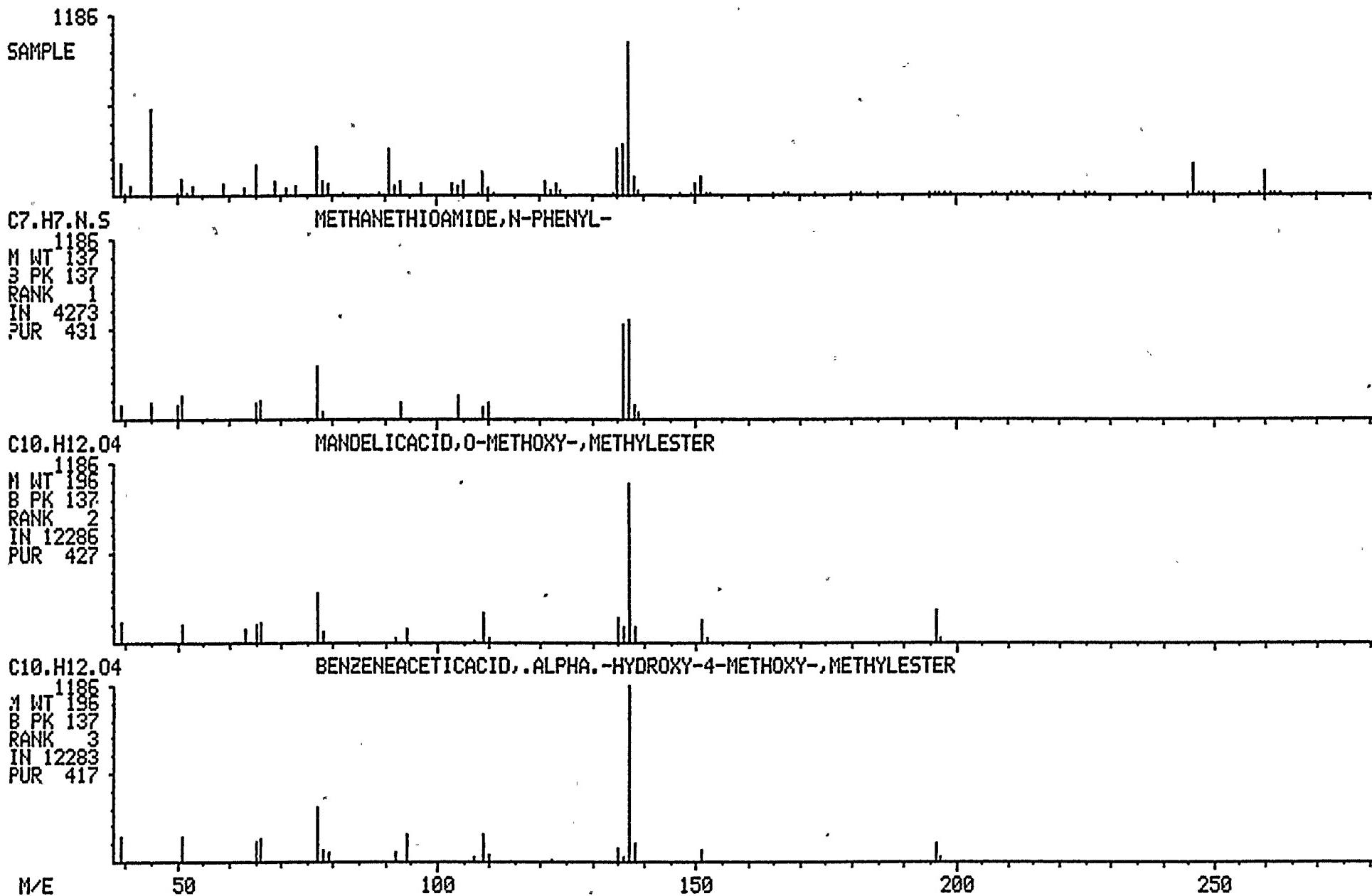
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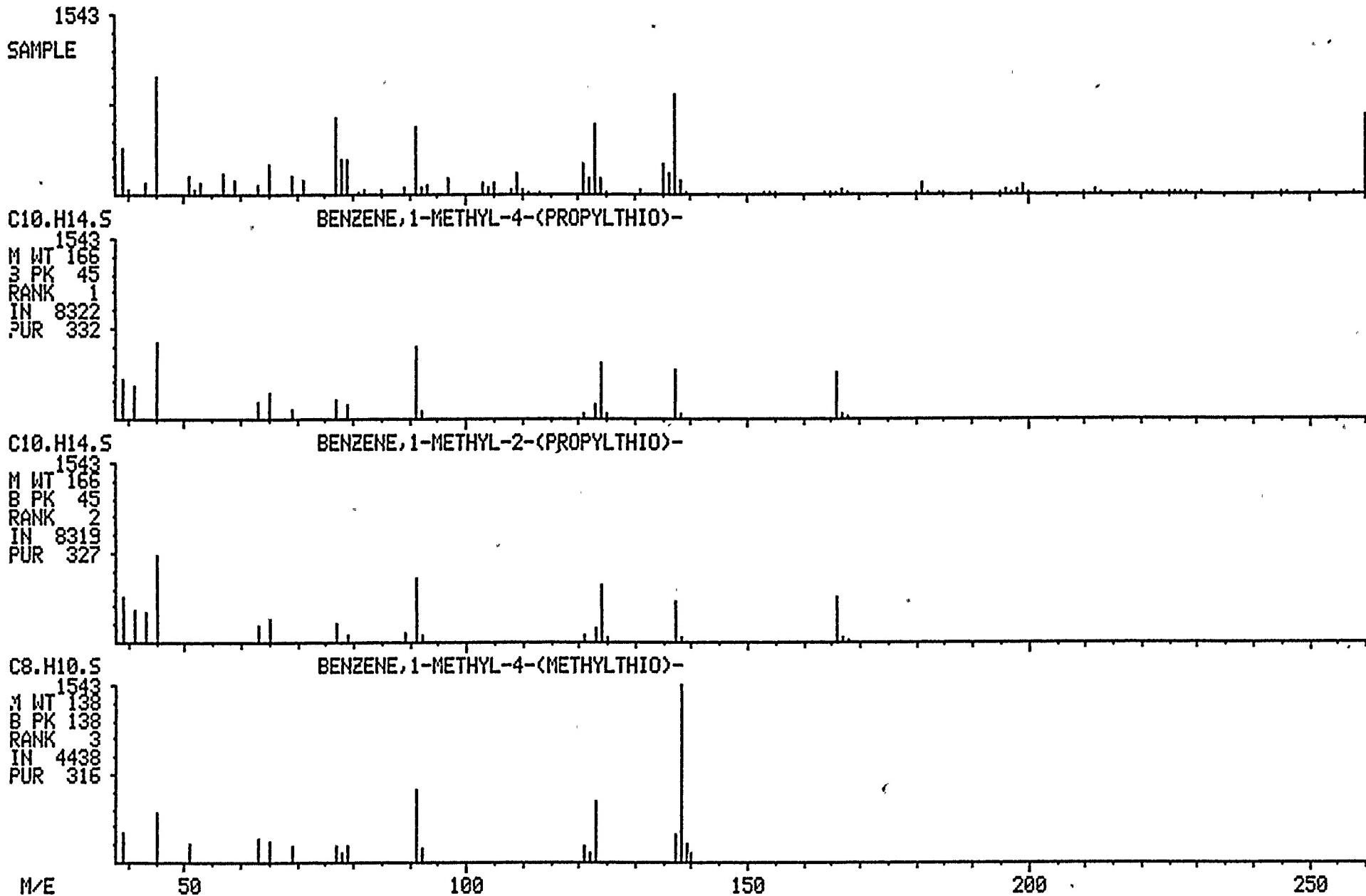
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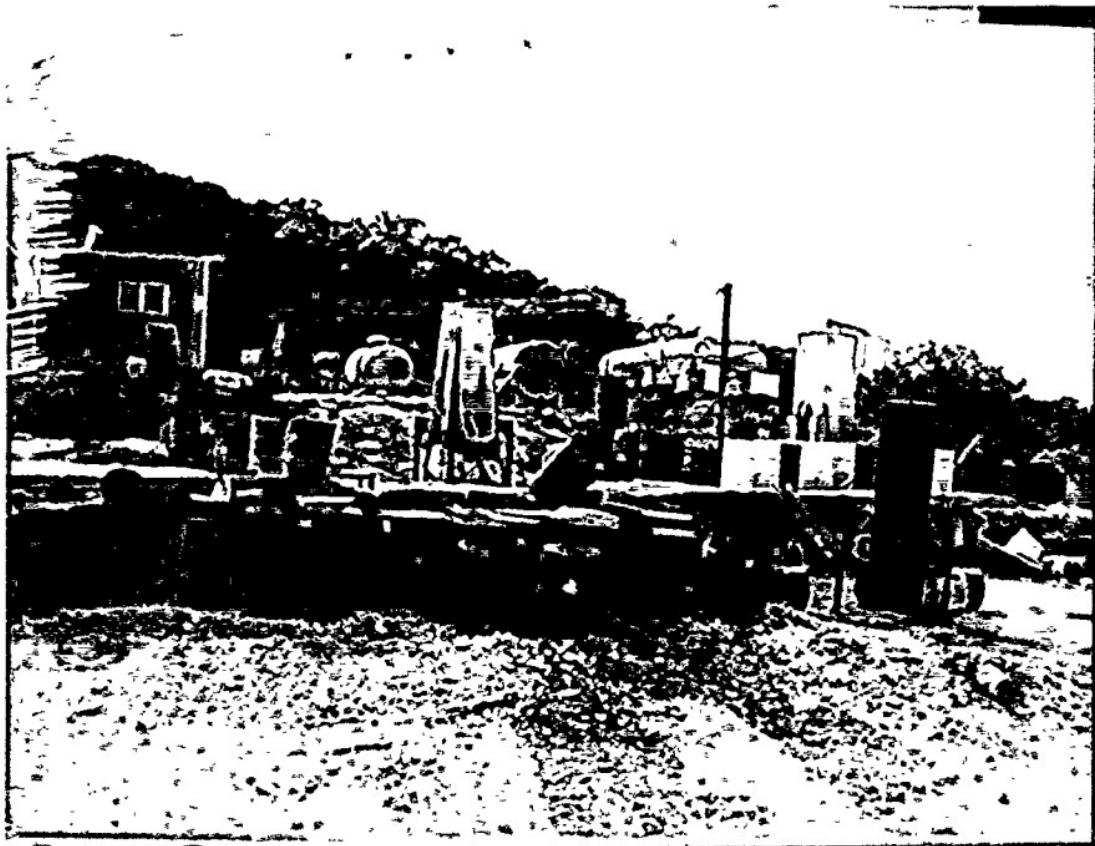
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CALI: CAL331 # 1

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ENCLOSURE





WORK STATEMENT A

(16 DEC 1976)

(AS REVISED 3 AUG 1977)

1. The contractor shall provide the following services and materials to the Government for the desealing of F-111 aircraft fuel cavities.

1.1 Technical Service: Provide on-site technical surveillance that is responsive to requirements that may arise out of a seven-day, three-shift work week. On-site support shall be furnished during the deseal operation as follows:

- a. Charging deseal machine with SR-51 chemical.
 - b. Removing SR-51 from deseal machine.
 - c. Charging deseal machine with alkaline and water solution.
 - d. Removing alkaline and water solution from deseal machine.
 - e. Charging deseal machine with clean water.
 - f. Clean and drain deseal machine after water rinse. Clean and adjust sprinklers after removal from aircraft.
 - g. Contractor to be present on-site during machine run of approximately forty-eight hours during SR-51 chemical operation.
 - h. Contractor to be present on-site during alkaline and water rinse of approximately eight hours.
- 1.1.1 Maintain and service contractor owned equipment including furnishing of all replacement parts thereof.

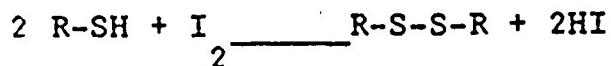
1.1.2. Constant surveillance while contractor owned equipment is in operation to insure optimum performance.

1.1.3. The in-use SR-51 recirculating fluid shall meet the following specifications:

- a. Temperature, °F 95-120 (34-48 °C)
- b. Mercaptan, 1.5-8.0 (New unused 4.5% minimum)
- c. pH Electrometric 5-9
- d. Specific gravity, .890-.950
- e. Sludge (initially), none
- f. Minimum flash point, no lower than 160 °F

1.1.4 Laboratory test process for SR-51 desealant fluid is:

la. Analytical test for the determination of Mercaptan concentration.



lb. Analytical Analysis

1) Take the specific gravity of the SR-51
Solution at 60 °F ± 5 °F

2) Pipet 5.00ml of this solution into a clean
125ml Erlenmeyer Flask

3) Pipet 25.00ml of 0.1 N standard Iodine
solution, made with methanol, not water,
and allow to react in the dark for 15
minutes.

- 4) Titrate with 0.1 N standard Sodium thiosulfate to a light straw color
- 5) Add 2-3ml starch solution. The solution should turn dark blue to black
- 6) Continue titration to a yellow end-point
- 7) Record the total number of ml of Sodium Thiosulfate used in the preceding titration

1c. Percent Mercaptan Concentration=

$$1) \frac{(A)(B)-(C)(D)}{I \quad I \quad T \quad T} \{120\} \{100\}$$

$$\frac{}{(Sp. Gr)\{1000\}}$$

or

$$\frac{(A)(B)-(C)(D)}{I \quad I \quad T \quad T} \{2.40\}$$

$$\frac{}{Sp. Gr.}$$

- 2) Where: A = ml standard Iodine
I
- B = Normality of standard Iodine
I
- C = ml standard Sodium Thiosulfate
T
- D = Normality of standard Sodium Thiosulfate
T
- 120 = Molecular weight of Mercaptan
- Sp. Gr. = Specific gravity of SR-51
- 3) Run three consecutive analyses and record their average on SM-ALC Form 706, "Deseal-and Recirculating Fluid SR-51 Test Results", (Attachment 1)

?a. pH Determination of SR-51 Desealant Fluid

- 1) Standardize the pH meter with two certified buffer solutions in the pH regions of 4.0 and 10.0 at their specified temperatures.
- 2) Clean the electrodes with distilled water.
- 3) Mix 20ml SR-51 with 20ml distilled water in a 100ml beaker. Allow the solutions to separate.
- 4) Determine the pH of the lower or aqueous portion.
- 5) Record the pH on the appropriate form.

3a. Specific gravity of SR-51 Desealant Fluid

- 1) Record the value acquired on 1a.1) on the appropriate form.

1.1.5. The data from SR-51 samples that do not meet the above specifications shall be circled in red. The contractor must take immediate action to add the required amount of SR-51 chemical, or take other required corrective action prior to proceeding with the desealing operation.

1.1.6. The contractor will perform quality control tests and titration tests at the site to assure maximum performance of chemicals and safety to aircraft. Such tests shall be accomplished prior to start of desealing an aircraft; after twentyfour hours and at the end of forty-eight hours. If the desealing of any aircraft exceeds forty-eight hours, additional samples

will be taken and tests made every eight hours and at completion. Test samples shall be taken from the bottom of the recirculating tanks with a "Beacon Sampler" (a container designed for taking samples from the bottom of large tanks). The contractor will

not use the chemicals unless these test requirements are met.

1.1.7 These tests shall be logged on SM-ALC Form 706, "SR-51 Descaling and Recirculating Fluid Test Results", or equivalent forms provided by government (atch 1).

1.1.8 Each test sample shall be identified with the aircraft serial number, temperature of SR-51 descalant fluid, a batch number and name of the sampler.

1.1.9 The batch number is made up of the julian date and the number of hours SR-51 has been recirculating in the aircraft, i.e., 6155-24. The 6155 is the julian date and 24 is the number of hours the SR-51 has been recirculating in each aircraft.

1.1.10 Copies of these log sheets shall be given to the Wash Rack foreman daily.

1.1.11 An accurate record shall be maintained of all additions of SR51, SR-51A, or other additives. The date and time, type of additive, quantity of additive, reason for addition and person making addition shall be recorded. These records shall be given to the Wash Rack foreman at the end of each shift. b6
b7c

1.1.12 The contractor will make available to the Physical Sciences Laboratory, MANC, Building 368, [redacted] Telephone Area Code [redacted] upon verbal request from the Wash Rack foreman, any materials and/or processes for the purpose of monitoring sampling, or testing. The Wash Rack foreman may direct the continuation of the descaling process if in his judgment the descaling process has not been successful and that additional descaling time (cycling of SR-51 Chemical) will correct the situation.

1.1.13 Any SR-51 desealant fluid that has been used and removed from the recirculating tanks cannot be reused without prior retest for verification of compliance with established control limits (para 1.1.3).

1.1.14 During the deseal process, Government furnished venting drums shall be used to scrub odors from the vent stack by use of the following process to be conducted by the contractor.

a. Hook up vent hoses to the fifty-five gallon venting drum. One hose for F2 tank and two hoses for LH and RH saddle tank.

b. Hook up a two inch vent hose from the top of the deseal unit to the bottom of the venting drum.

c. Add 5-10 gallons of water to venting drum.

d. Add 7-10 pounds of bleach solution. Note: Always pour the bleach into the water. This calcium hypochlorite bleach solution should be premixed in a separate bucket away from the aircraft and away from the SR-51.

e. Stir the bleach solution thoroughly to dissolve completely. Fill venting drum to halfway mark with water. Stir again and let settle.

f. Change the bleach solution at the start of each deseal.

g. Caution: Remove hoses from deseal unit and aircraft before draining deseal unit.

h. Caution: Keep dry chlorine bleach away from eyes, skin and clothing. In case of eye contact flush immediately with water and seek medical attention.

i. Caution: Keep dry chlorine bleach away from SR-51, solvents, paints, etc., as explosion and fire may result.

1.1.15 Furnish and operate SR-51 pumps (contractor owned).

1.2 Materials: Furnish the following chemical solution in sufficient amounts; SR-51 desealant, SR-51A desealant reactivation and 6D500 alkaline cleaner. These chemical solutions shall have been tested by the contractor. A copy of chemical analysis, (using processes outlined in para 1.1.4) and certification made that chemicals are no more hazardous than those specifications shown on DD Form 1813, "Material Safety Data Sheet" 46-70839, dated 31 May 1976 will be made for each batch shipped.

1.3 Equipment: Provide adequate quantity of deseal units, manifolds with spray heads and suction hoses. Return hoses and related equipment capable of simultaneously desealing two aircraft (continuous forty-eight hour time span) Alkaline washing (eight hours) and clear water washing until the returned water produces a pH of 7.0 to 9.0.

1.3.1 Provide five sets of internal manifolds with spray heads. Provide adequate pumps to facilitate drainage of saddle tanks.

1.3.2 Provide emergency service for equipment or in lieu thereof, adequate standby equipment to assure no production stoppage during scheduled maintenance.

1.4 Prior to commencement of work, the contractor shall furnish to and keep the contracting officer advised as to any special instructions, in addition to the provisions of the Health and Environmental Protection Requirement for P-111 Chemical Desealing Process, Dated 77 Apr 12, for handling of above chemicals to insure against safety hazards.

1.5 Packaging/packing: The packaging/packing of desealing chemical (SR-51), desealing rejuvenator (SR-51A) and alkaline wash (SD-500) from contractor source to contractor personnel at McClellan AFB, California will be in accordance with commercial practice. The contractor is responsible for conformance with all applicable Department of Transportation, National Motor Freight Classification, etc. regulations/tariffs regulating packaging, packing and marking of hazardous materials. Special marking shall also include any and all special handling procedures, storage requirements and procedures related to receipt, unloading, or storage that may be performed by government personnel incident to receipt of materials at McClellan AFB prior to turnover to the contractors personnel. Copies of all applicable certifications, special permits, chemical specifications, handling procedures, restrictions, shipping names, etc will be forwarded to SM-ALC/DSP, McClellan AFB, California, prior to actual shipment.

2. The government shall provide the following in support of the desealing operation at no cost to the contractor:

2.1 Utilities required for the deseal units. Contractor shall be responsible for all connections.

2.2 Office space will include electricity and heat for technical assistance representative.

2.3 Storage area for contractor supplies. (Maximum 120 each, 55 gallon drums).

2.4 Personnel for the installation and operation of the equipment other than that defined above as contractor responsibility.

2.5 Materials: Furnish calcium hypochlorite (Technical Specification OC-114B, NSN 6810-00-255-0472) for use in scrubbing odors from vent stack.

2.6 Furnish manifold and venting drums for use in scrubbing SR-51 odors from the vent stack.

2.7 Disposition Instructions: At the conclusion of the contract the space used and storage area shall revert back to the Government. Venting drums will be turned in to the Wash Rack foreman for turn in to Reclamation. If any calcium hypochlorite remains it will be turned in to the Wash Rack foreman for disposition to the Civil Engineer.

3. Protective gear in the form of the following wash rack clothing and equipment shall be worn by all contractor personnel during any contact with the chemicals used in this desealing operation.

3.1 Wash rack type long sleeved jacket, pants, boots, hood and gloves.

3.2 Full-face piece air-supplied respirator masks with a pressure demand air flow regulator shall be worn if a worker is required to enter the fuel cavities before the chemicals are thoroughly washed away or shall be worn if a worker must work with any other portion of the desealing system with the system opened and chemicals present. (The desealing system is defined as the chemical reservoirs with the hoses attached and extending into the fuel tanks).

3.3 If personal contact occurs with any of these chemicals, the worker shall immediately wash the area with soap and water. In case of eye contact, the worker shall flush with large volumes of water and consult a physician if irritation persists.

CHEMICAL LABORATORY SAMPLINGS, ANALYSIS AND RECOMMENDED CORRECTIVE ACTION

TO:		FROM: (Organization, person to contact & telephone no.)				DATE:			
1. SUBJECT: Dessealant Recirculating Fluid, SR-51 Test Results				2. TESTED BY:			3. SAMPLED		
4. MATERIALS OR PROCESSES SAMPLED		SAMPLING RESULTS							
12AEI-200-1060		Control Limits A	Sample Number 1 Initial (0 hrs) B	Sample Number 2 24 hrs C	Sample Number 3 48 hrs D	— hrs E	— hrs F	G	H
Aircraft Number									
Reservoir Capacity (gallons)									
Date Sampled									
Time Sampled									
Sample Number									
Recirculating SR-51									
Mercaptan, Con. (Minimum wt %)		1.5 - 7							
pH, Electrometric		5 - 9							
Specific Gravity		.880 - .930							
Temperature (°F)		95 - 120							
Compliance to limits:									
Wash Rack Bldg 375									
RECOMMENDED CORRECTIVE ACTION (As checked)									
7. CHECK									
8. REMARKS					9. OFFICIAL SIGNATURE				

INSTRUCTIONS: Sampling results in Item 5, columns A, B, C etc. are recorded only for corresponding entries in Item 4. The receiving activity will record action taken under "remarks" and retain for 3 months or until completion of action, whichever is sooner, then destroy.

SM-ALC FORM SEP 60 706 This form is designed to be used as a master. When properly filled in, and the format not changed, it may be submitted directly to the Printing facility for reproduction.

ATCH

1. 6 Operation of Desealing Unit:

NOTE

It is very important that the temperature of the fluid be monitored closely. During hot weather it may be necessary to cool the fluid because of heat added by the mechanical action of pumping.

- a. Fill the desealant reservoir of the pumping unit with SR-51 desealing fluid.
- b. Activate desealant reservoir heater unit to control temperature of the input desealant fluid to the fuel tanks between 95 degrees F to 120 degrees F.
- c. Start pumps on desealing unit and continue spraying SR-51 fluid for 24 hours. Monitor temperature of fluid per 1. 6b and clean filters of pumping unit as necessary to insure proper flow of fluid. Rinse filters with water hose.

CAUTION

Observe all supply and drainage lines, temporary cover gaskets, and fuel tank structure for leakage. If leaks occur, stop the recirculating spray unit and make the necessary corrections.

- d. When the 24 hour recirculating spray period has been completed drain all SR-51 back into the reservoir tank.
- e. Spot check extent of sealant removal by removing a few of the temporary covers in the forward and aft tanks. Continue SR-51 circulation for another 24 hours.
- f. All used SR-51 shall be barreled and disposed of by Eldorado Chemical Company, Inc. Reusable SR-51 shall be stored in closed containers.
- g. Rinse the reservoir with clean tap water and drain into marked 55 gallon barrels for disposal.

1.7

Action Required Should a Spill of SR-51/GD-500 Occur:

- a. The opening in the dike will be blocked prior to start of the chemical deseal operation, and for the first 30 to 60 minutes of the SR-51 deseal operation, in order to contain any unpredictable spillage. In the event of a spill, insure the opening is blocked. Large spills from tank rupture or broken lines will be pumped into the waste tank trailer, using an air-driven sump pump. Smaller spills will be pumped directly into barrels.
- b. Where it is not possible to stop fluid leakage from the aircraft, drip containers will be placed to collect the leakage. The drip containers will be barrel-and-funnel arrangements. Contents of the drip containers will periodically be returned to the deseal unit reservoir or to waste drums. The containers will be emptied and capped at all times when not in use to collect leakage.
- c. In case of a ruptured tank or a broken line, immediately shut down the deseal pumping system, make sure the drain opening in the dike is blocked, start a pumping operation into the waste tank trailer, and water-flush the spill area, after all the SR-51 or alkaline solution has been removed. Warn all personnel in the wash rack area of the spill. Immediately notify the Civil Engineering Fire Protection Branch (DEF), 643-5621, and state in clear, concise language the nature of the emergency, the material (SR-51 or GD-500) and amount involved, the distance from and the threat to the drainage system and any other information needed for reaction decision. Notify the wash rack foreman of the spill.

CAUTION

Spillage or leakage of fresh or used SR-51 into the industrial drain system is prohibited.

- h. Rinse with alkaline cleaner.
- i. Fill the pumping unit reservoir tank with 25% (by volume) solution of Eldorado #GD-500 alkaline cleaning compound and 75% clean tap water.
- j. Pump the alkaline cleaner through the recirculating spray system for a minimum of one hour with the temperature of the fluid controlled at 120 degrees F to 140 degrees F.
- k. After completing the alkaline rinse cycle, drain the fluid back into the reservoir tank of the pumping unit. Reusable SR-51 contaminated alkaline rinse fluid shall be stored in closed containers. Batches of SR-51 contaminated alkaline rinse fluids which are no longer usable shall be barreled and disposed of by Eldorado Chemical Company, Inc.

CAUTION

SR-51 contaminated alkaline rinse fluids shall not be released to the industrial waste system. Spillage or leakage of uncontaminated alkaline rinse fluids into the industrial drain system is prohibited.

- l. Rinse with clean tap water and pump through the spray system at a temperature of 67 degrees F to 110 degrees F.
- m. Pump the clean tap water through the recirculating spray system for a minimum of 30 minutes and continue until a sample of the return water produces a pH reading of 7.0 to 8.0. Continue spraying until the rinse water falls within the 7.0 to 9.0 pH range. Tap rinse water may be disposed of in the industrial waste system.

77 APR 12

HEALTH AND ENVIRONMENTAL PROTECTION REQUIREMENTS
FOR F-111 CHEMICAL DESEALING PROCESS

The following definitions apply throughout these requirements:

Wash Rack: That portion of the Aircraft Wash Rack, Building 375, outside of the Deseal Area.

Deseal Area: The approximate rectangular area of the Aircraft Wash Rack, Building 375, in which the F-111 chemical desealing processes are accomplished, containing the aircraft, desealing units, plumbing lines, tankers for waste liquids, and associated equipment.

Depainting: Any and all operations, not involving the F-111 Chemical Desealing Process, conducted on the Wash Rack.

SR-51 Desealing: Any and all operations, involving exposure to SR-51 desealing fluid; including handling, pumping, cleaning, flushing, repairs, inspections, waste disposal..

Alkaline Rinse: Any and all operations involving exposure to SR-51 contaminated alkaline rinse fluid; including handling, pumping, cleaning; flushing; repairs, inspections, waste disposal.

Water Rinse: Any and all operations involving exposure to SR-51 contaminated water rinse fluid; including handling, pumping, cleaning, flushing, repairs, inspections, waste disposal.

Water Pic: The mechanical removal of sealant with high pressure water jet.

1. The Deseal Area shall be designated a restricted area.

a. Entrance to the Deseal Area shall be controlled by means of barricade and warning signs which shall be in effect during SR-51 desealing and during alkaline rinse. The boundaries for the barricade shall be as follows: West side - the wall; North side - enclose Eldorado barrels and tankers during SR-51 Desealing; otherwise, the Wash Rack apron, provided that the Eldorado barrels and tanker are closed and no spillage is present; East side - in front of the aircraft approximately at the wing slab line, enclosing the sump. The warning sign shall convey the following message, or equivalent wording: Restricted Area, Chemical Desealing, Authorized Personnel Only.

- b. Only those personnel directly involved in performing or testing SR-51 Desealing or Alkaline Rinse shall be allowed in the Deseal Area. The number of personnel allowed within the Deseal Area shall be controlled to the minimum number required during SR-51 Desealing and Alkaline Rinse.
2. A deluge shower shall be in the Deseal Area, located so that it is readily accessible to all persons in the Deseal Area.
3. Written procedures shall be provided to each person involved in SR-51 Desealing or Alkaline Rinse in the Deseal Area and to those persons involved in depainting in the Wash Rack to describe the protective procedural measures and the protective equipment required in the Deseal Area and Wash Rack during SR-51 Desealing and Alkaline Rinse.
4. The personal protective clothing and equipment listed below shall be worn by all personnel within the Deseal Area during SR-51 Desealing and Alkaline Rinse.
- Wash Rack type long-sleeved jackets, pants, boots, hood and well-fitted polyethylene or polyvinyl gloves.
5. Protective clothing or equipment contaminated with SR-51 desealing fluid or alkaline rinse fluid shall be washed off in the Deseal Area before being removed.
6. Eating, drinking, or smoking shall not be allowed in the Deseal Area or the Wash Rack. Persons exiting the Deseal Area or the Wash Rack shall wash before eating, drinking, or smoking.
7. Personnel in the Deseal Area or the Wash Rack who experience symptoms of irritation of eyes, nose or skin; nausea; vomiting; abdominal cramps; pounding headaches; dizziness; faintness; weakness of muscles; or other symptoms not understood shall report to Occupational Medicine Services (SGC) for medical attention.
8. Aircraft which have been chemically desealed and rinsed shall be dried before being moved into any other personnel occupied area. Drying shall be conducted outdoors or in Building 239.
9. The "picture frames" shall be removed in the Deseal Area, and the contaminated gaskets shall be replaced in the Deseal Area. Organic vapor, chemical cartridge respirators, wash rack type long sleeved jackets, pants, and boots, and

polyethylene or polyvinyl gloves shall be worn by persons performing these tasks. (Para 4 applies during SR-51 Desealing and during Alkaline Rinses)

10. Persons performing Water Pick shall wear, in addition to their protective rubber clothing and gloves, full facepiece air-supplied respirator with pressure-demand air flow regulator.
11. Persons who must use air-supplied respirator protection shall immediately be given training in the use and care of these respirators.
12. The breathing air for respirators shall meet the quality requirements of T.O. 42B-1-22. The breathing air quality testing requirements of T.O. 42B-1-22 shall be adhered to strictly.
13. The requirements of OSHA Standard 1910.134 for respiratory protection shall be adhered to, except 1910.134(d)(1), quality requirement for breathing air.
14. Respirators not in use shall be stored outside the Deseal Area and Wash Rack in a clean and sanitary location.
15. Persons in the Deseal Area and the Wash Rack shall be medically examined according to instructions by Occupational Medicine Service (SGC). Newly assigned personnel, including those temporarily assigned or loaned, to the wash rack, or the Deseal Area shall be given a preplacement physical examination by SGC.
16. The "Sprinkler System" (plumbing lines, sprinkler heads, and tank plate covers) shall be thoroughly washed in the Deseal Area to remove all SR-51 residue and odor. Washing shall be accomplished using steam cleaning, scrub brushing with Eldoradec ED-500, or cleaning with chlorinated water, and water rinse as necessary to achieve a clean product without odor. The SR-51 contaminated felt padding in the wooden box pallets (used to transport the sprinkler system) shall be replaced with clean felt. At any time this felt becomes a source of SR-51 odor, it shall be replaced. Organic vapor chemical cartridge respirators, wash rack type long sleeved jackets, pants, and boots, and polyethylene or polyvinyl gloves shall be worn by persons performing these tasks. (Para 4 applies during SR-51 Desealing and during Alkaline Rinse.)

SECTION IV HEALTH HAZARD DATA		See Section II	
EMERGENCY AND FIRST AID PROCEDURES			
<p>Wash with soap and water, for eyes flush with large volumes of water and contact physician</p>			
SECTION V REACTIVITY DATA	STABILITY	CONDITIONS TO AVOID	
	UNSTABLE		
	STABLE	XX	
	INCOMPATIBILITY (Materials to avoid)		
HAZARDOUS DECOMPOSITION PRODUCTS			
SECTION VI SPILL OR LEAK PROCEDURES	MAY OCCUR	CONDITIONS TO AVOID	
	HAZARDOUS POLYMERIZATION		
	NOT	XX	
	STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED		
<p>Pick up with absorbant</p>			
WASTE DISPOSAL METHODS			
<p>Contains petroleum solvent, separate in grease trap.</p>			
<p>Odor may be reduced by contact with bleach.</p>			
<p>Water soluble portion may be flushed to sewer</p>			
RESPIRATORY PROTECTION (Specify type)			
VENTILATION (LOCAL EXHAUST)		SPECIAL	
MECHANICAL FANS		OTHER	
REQUIRED 1. 200 cfm/ft ²		EYE PROTECTION	
PROTECTIVE GLOVES		Face Shield	
OTHER PROTECTIVE EQUIPMENT			
Rubber clothing (wash rakk gear)			
PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING			
<p>Avoid skin contact</p>			
OTHER PRECAUTIONS			
PROPER SHIPPING (Article) NAME		DOT CLASSIFICATION	
DOT LABEL		EMERGENCY ACCIDENT PRECAUTIONS AND PROCEDURES	
DOT PLACARD		Avoid skin contact	
PRECAUTIONS TO BE TAKEN IN TRANSPORTATION		None required	

MATERIAL SAFETY DATA SHEET

DRAFT NO. 44, DATED: May 31, 1976

EMERGENCY PHONE NO.

512-653-2060

494-5337

MANUFACTURER'S NAME AND ADDRESS (Under Supply Code for Manufacturers)

EDDORAY CHEMICAL CO., INC. - SCM - 191

ADDRESS (Number, Street, City, State, and ZIP Code)

P.O. BOX 32173 SAN ANTONIO, TX 78216

SECTION I -

CHEMICAL NAME AND SYNONYMS

N/A

TRADE NAME AND SYNONYMS

SR-51

CHEMICAL FAMILY
N/A

FORMULA

N/A

FED AL STUAR TMB:HFSN

GROSS WEIGHT (LBS)

418

OUTSIDE PACKAGE DIMENSIONS (inches)

23 x 23 x 32

MIL-STD-1341, NATIONAL FIRE PROTECTION ASSOCIATION STD 704M SIGNAL

FLAMMABILITY 1 HEALTH 1 REACTIVITY 0 SPECIFIC HAZARD 0

PARTS, PRESERVATIVES, AND SOLVENTS	%	THRESHOLD LIMIT VALUE (Units)	ALLOYS AND METALLIC COATINGS	%	THRESHOLD LIMIT VALUE (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLED METAL PLUS COATING OR CORE FLUX		
ADDITIONS			OTHERS		
OTHERS					

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES		%	THRESHOLD LIMIT VALUE (Units)
THIOPHENOL		10-20	10 ppm
PYRROLIDONE		5-10	100 ppm
TRI-THYL PHOSPHATE		1-5	10 ppm
PETROLEUM SOLVENT (High Flash Aromatic)		60-90	100 ppm

BOILING POINT (°F.)	380°	SPECIFIC GRAVITY (H ₂ O=1)	.9
VAPOR PRESSURE (mm Hg.)	20	PERCENT VOLATILE BY VOLUME (%)	80%
VAPOR DENSITY (AIR = 1)	5	EVAPORATION RATE (WATER = 1)	.5
SOLUBILITY IN WATER	Negligible		

APPEARANCE AND ODOR	Thin yellowish liquid, strong rotten odor
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FLASH POINT (Method used) Above 165°F COC	FLAMMABLE LIMITS	LOWER EXPLOSIVE LIMIT 2%	UPPER EXPLOSIVE LIMIT 15%
--	---------------------	-----------------------------	------------------------------

EXTINGUISHING MEDIA CO ₂ , Water
--

SPECIAL FIRE FIGHTING PROCEDURES None
--

UNUSUAL FIRE AND EXPLOSION HAZARDS May liberate sulfur oxide fumes during combustion

SECTION IV - FIRE AND
EXPLOSION HAZARD DATA

DD

FORM 1813
1 JUN 71

90

VGO hydrogenation reaps benefits in olefin production

A. Rhœ

Société Française des Techniques Lummus
Paris, France

J. M. Fernandez-Baujin
Lummus Co.
Bloomfield, N.J.

R. K. Dorn
Lummus GmbH
Wiesbaden, West Germany

O. Neuwirth
Union-Rheinische Braunkohlen-Kraftstoff
Wesseling, West Germany

Uncertainties in feedstock and by-product prices make selection of the optimal feedstock slate a critical factor in planning new olefins plants.

The trend in the industry is toward use of even heavier crude oil fractions; i.e., vacuum gas oils with end points as high as 500°C. (Table 1). This was emphasized by a recent decision of the People's Republic of China to build four 300,000 ton/yr ethylene complexes that will crack straight run vacuum gas oil using the C-E Lummus process.

Straight run gas oils typically contain between 0.15 and 3.0 wt% sulfur. This sulfur concentrates in the pyrolysis fuel oil product.

In general the sulfur concentration in the pyrolysis fuel oil is about four to five times that of the feedstock.

Where this high-sulfur fuel oil is not environmentally acceptable for burning, the feedstock is desulfurized. The degree of desulfurization depends upon the acceptable fuel oil sulfur levels.

In desulfurization, the sulfur in the molecular structures of the feed is replaced with hydrogen (Fig. 1). Thus, products from desulfurization have a somewhat higher petrochemical potential than that of the feed (Table 2).

At constant ethylene production, the pyrolysis of desulfurized atmospheric gas oils, characterized by a significant reduction in fuel oil production and a lower feed requirement, compared with straight run feed. The production of C₆-C₈ aromatics, however, is essentially constant. A higher aromatic yield is balanced by the lower feed consumption.

Even though the yields of valuable byproducts are enhanced after desulfurization, the once-through ethylene yields from vacuum gas oil (fractions boiling from 360°C. to 500°C.) are still rather low, 18-20 wt%. In addition, the fuel oil production can be as high as twice that from a typical atmospheric gas oil.

Both characteristics, low ethylene and the high fuel oil yields, are a consequence of the high content of non-olefins producing components, such as polycyclic aromatics, as well as to the polycyclic napthenes present in the feedstock.

For example, a hydrodesulfurized

343-566°C. cut from Light Arab oil has about 50 wt% aromatics. The content of polycyclic aromatics is about 24 wt%. The content of polycyclic napthenes is 20 wt%.

Therefore, an olefins plant totally based on vacuum gas oil requires an abundant source of feedstock as well as a market for the large quantities of pyrolysis fuel oil.

Hydrogenating further. Hydrogenation of gas oils beyond their desulfurization requirements has been evaluated as a pretreatment process to improve their olefin yield. Through partial and total hydrogenation, as well as through carbon ring opening reactions, the aromatic molecular structures of the feedstock would be converted into compounds with higher petrochemical producing potential.

The effect of hydrogenation reactions on the olefins potential of oils was first evaluated using atmospheric gas oils (200-380°C.). Partial hydrogenation was effective in enhancing the C₆-C₈ aromatics (13). The fuel oil yield was significantly reduced.

However, partial hydrogenation was not effective in improving olefins potential of the gas oil.

By modifying the catalyst type and the operating conditions, a degree of gas oil hydrogenation can be achieved. While the partial hydrogenation was somewhat effective in reducing the pyrolysis fuel oil yield

Hydrodesulfurization reactions

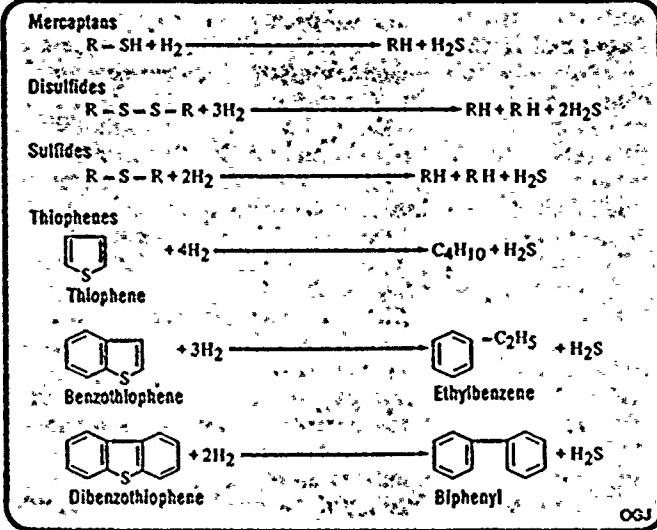
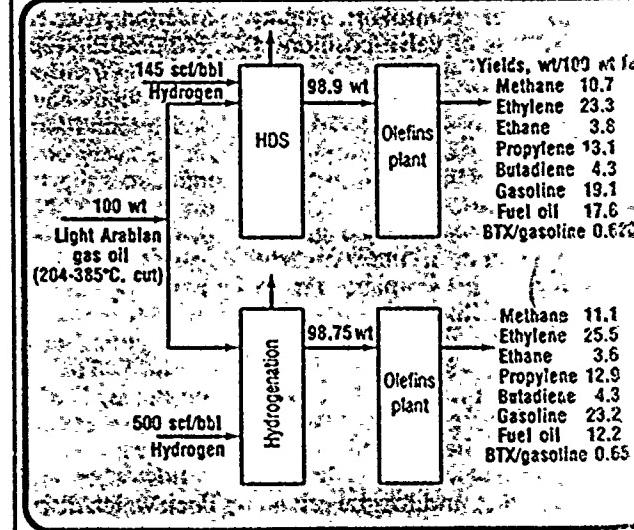


Fig. 1

Effect of deep hydrogenation



ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 12-11-2009 BY 60324 uc baw/sab/lsg

1138178

(Title) _____

(File No.) _____

It's sent to Sub A folder



26GA-DL-88532-1A's

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE

Date: 10/06/2000

To: Counterterrorism

Attn: DTOU

UC

All Divisions

b6
b7C

From: Dallas

Domestic Terrorism

North Texas Joint Terrorism Task Force (NTJTTF)

Contact: SA [redacted] (214) 922-7774

SA [redacted] 214) 922-7709

Approved By: [redacted]

Drafted By: [redacted] mac

88532

Case ID #: 266A-DL-NEW (Pending) -1

Title: UNSUB(S);
143 TONS OF AMMONIUM NITRATE MISSING
FROM EL DORADO CHEMICAL COMPANY,
WAXAHACHIE, TEXAS;
AOT-DT-VC

Synopsis: To summarize initiation of Full Field Investigation.

Full Field Investigation Instituted: 10/06/2000

Reference: 266-DL-0
266-OC-0

Details: On 10/05/2000, the North Texas Joint Terrorism Task Force (NTJTTF) was contacted through EC by the Oklahoma City Field Office regarding 143 tons of Ammonium Nitrate reported missing from the EL DORADO CHEMICAL COMPANY, Waxahachie, TX. The Oklahoma City Field Office was telephonically contacted on 10/05/2000 by [redacted] Legal Department, LSB INDUSTRIES, 16 South Pennsylvania, Oklahoma City, OK, telephone number [redacted] who provided the following information:

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LSB INDUSTRIES (LSB) is the parent company for EL DORADO CHEMICAL COMPANY (EDC) in Waxahachie, TX telephone number (972) 937-5717. In July, 2000 an annual physical inventory at EDC revealed that approximately \$50,000.00 in inventory was missing from EDC. Included in the missing inventory was approximately 143 tons of bulk high density Ammonium Nitrate

[redacted]
D [redacted]

Source: II

J None & other

CPI: NOTE

280 Mac 01.ec

A 10/6/00

266A-DL-88532-1

To: Counterterrorism From: Dallas
Re: 266A-DL-NEW, 10/06/2000

(AN). Other components of fertilizer were also discovered to be missing during the inventory.

On 10/04/2000, four of the six employees at EDC all resigned. These employees are all members of a religious cult known as the CHURCH OF GOD in Waxahachie, TX. They had requested some days off from work because of the current position of the moon. Their requests were denied so they resigned from EDC.

[redacted] office was just made aware of the results of the July inventory on 10/04/2000. She does not know if any of the four persons who resigned were responsible for the missing AN but she wanted to report the situation. The last physical inventory at EDC by an outside person prior to July, 2000 took place in approximately July, 1999.

[redacted] identified the four resigning EDC employees as follows:

1.

2.

3.

4.

Indices checks conducted by the Oklahoma City Field Office were negative for the above individuals. In addition to the above individuals, two other EDC employees have resigned since June, 2000. They were identified as follows:

1.

2.

To: Counterterrorism From: Dallas
Re: 266A-DL-NEW, 10/06/2000

Upon receipt of information, the NTJTTF telephonically contacted [redacted] for assistance in locating [redacted] EDC [redacted] NTJTTF agents subsequently traveled to Waxahachie and conducted interviews of the following individuals, all of whom are current EDC and/or LSB employees:

1. [redacted] EDC, Waxahachie, TX.
2. [redacted] LSB, Oklahoma
City, OK.
3. [redacted] EDC, Waxahachie, TX.

Interviews corroborated the fact that the following items are missing from the EDC facility in Waxahachie, TX:

1. 143.38 tons of Ammonium Nitrate
2. 42.26 tons of Potash
3. 5.97 tons of K-mag
4. 43.60 tons of Dap

Although interviews did not corroborate that the four resigning members were directly involved in the missing chemicals, interviews did identify that during a period of approximately two months during the summer of 2000, the four individuals were in control of the EDC facility without daily supervision due to a June 2000 management turnover. Interviews also indicated the possibility that [redacted] during his tenure at EDC, had possibly sold chemicals to individuals lacking the proper license to purchase and/or possess such chemicals.

Interviews further determined that the four resigning EDC employees were members of the CHURCH OF GOD, aka CHURCH OF GOD EVANGELISTIC ASSOCIATION (COG), Waxahachie, TX.

COG is [redacted]. In addition to being identified by the NTJTTF as [redacted] COG, [redacted] publishes NEWSWATCH MAGAZINE (NWM), a monthly magazine which claims to be "a magazine making clear today's news in the light of Bible prophecy". In addition to Biblical narrative, the magazine features numerous articles concerning conspiracy theories such as the alleged government cover-up of the Waco/Branch Davidian siege and the alleged United Nations/New World Order take-over of the United States.

To: Counterterrorism From: Dallas
Re: 266A-DL-NEW, 10/06/2000

NWM [redacted] As depicted in the NWM November 15, 1999 edition, [redacted] has placed 26 billboards in the State of Texas "to warn Texans of United Nations (UN) plans to occupy us". The billboards feature the statement, "Could Texas Be Occupied By United Nations Troops?" and telephone number of 1-800-516-8736. Depicted on the billboards are photographs claimed by NWM to be of white UN military vehicles located in the UNITED States.

As advertised in NWM, [redacted] also maintains an Internet website entitled www.newswatchmagazinew.org. Research of referenced website reveals similar rhetoric as found in NWM, in addition to sales of conspiracy related books and videos. The Southern Poverty Law Center (SPLC) lists [redacted] COG as an active "militia/patriot group" and uncorroborated NTJTTF source information has alleged that COG members may be involved in weekend paramilitary training. Additional research conducted by the NTJTTF has indicated [redacted] to have once been an active supporter/associate of [redacted] REPUBLIC OF TEXAS (ROT). An ROT document, addressed to the United Nations and dated 12/18/1995, indicated what appears to be [redacted] signature on pages nine and thirteen.

Telephonic discussion on 10/06/2000 between SSA [redacted] SSA [redacted] and [redacted] OGC, indicated that surveillance of COG facilities in order to gather intelligence and/or vehicle license plates was within legal parameters as outlined in the Attorney General Guidelines. It is believed that various COG members may benefit from referenced chemicals possibly in the possession of former EDC employees.

Based upon the nature of the missing chemicals, the possibility that EDC chemicals were sold and/or distributed in an illegal manner by referenced former EDC employees, and the nexus of the former EDC employees to an recognized individual or group directly connected to anti-government extremist beliefs/ideology, the NTJTTF initiates a Full Field Investigation. The NTJTTF sets forth the an All Divisions lead and provides the following biographical data:

To: Counterterrorism From: Dallas
Re: 266A-DL-NEW, 10/06/2000

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Descriptive Data:

Main Subject

Name -
Last:
First:
Middle:
Race:
Sex:
DOB:
SSAN:
Drivers License:
Address(es) -
House #:
Street Name:
City:
State:
Postal Code:
Vehicle:



Main Subject

Name -
Last:
First:
Middle:
Race:
Sex:
DOB:
SSAN:
Drivers License:
Address(es) -
House #:
Pre Direction:
Street Name:
City:
State:
Postal Code:



To: Counterterrorism From: Dallas
Re: 266A-DL-NEW, 10/06/2000

b6
b7C

Main Subject

Name -
Last:
First:
Middle:
Race:
Sex:
DOB:
SSAN:
Drivers License:
Address(es) -
House #:
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Street Name:
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Main Subject

Name -
Last:
First:
Middle:
Race:
Sex:
DOB:
SSAN:
Drivers License:
Address(es) -
House #:
Pre Direction:
Street Name:
City:
State:
Postal Code:



To: Counterterrorism From: Dallas
Re: 266A-DL-NEW, 10/06/2000

LEAD(s) :

Set Lead 1:

ALL RECEIVING OFFICES

Read and clear.

♦♦

- 1 -

FEDERAL BUREAU OF INVESTIGATION

b6
b7C

Date of transcription 10/06/2000

Upon being advised of the identity of the interviewing agent as a Special Agent (SA) of the Federal Bureau of Investigation (FBI), 1801 North Lamar Street, Suite 300, Dallas, Texas 75202, telephone number 214/720-2200, and the nature of the interview, [redacted] and [redacted]

[redacted] El Dorado Chemical Company (EDCC), 4500 North West Street, El Dorado, Arkansas 71730, telephone: [redacted] provided the following information:

[redacted] stated he had been employed with EDCC, since 1983. [redacted] stated EDCC was created in May of 1983. [redacted] stated EDCC was an ammonium nitrate (AN) production facility.

[redacted] stated EDCC produced two types of AN. [redacted] stated one type was called high density AN (HDAN) which has agricultural applications. The other type was referred to as low density AN (LDAN), which when allowed to *absorb fuel oil, can be used as an effective explosive. LDAN was commonly used in mining/excavation.

[redacted] stated EDCC shipped AN to various locations around the United States (US), by both rail and truck. [redacted] stated EDCC used a computerized system to track the destinations and amount (weight in tons) of AN shipments to EDCC's various distributors.

[redacted] stated that HDAN was commonly shipped to an HDAN distributor also named the El Dorado Chemical Company (ECC), Waxahachie, Texas (located approximately twenty miles south of Dallas, Texas).

[redacted] stated EDCC can produce a maximum of 1100 tons of HDAN "prills." AN prills were described as "B-B like" in size and shape. [redacted] stated the Spring of each year tended to be the peak demand period for HDAN, EDCC produced at/near their maximum HDAN production rate during the Spring.

*[redacted] stated that the prills must be ground up before they have the ability to absorb fuel oil. [redacted] stated that "grinders" were commercially available for this function.

Investigation on 10/06/2000 at Dallas, Texas (telephonically)

File # 266A-DL-88532 280sss01.302 Date dictated 10/06/2000

by SA [redacted] : sss

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/06/2000

2

, Page _____

[redacted] stated that during the normal agricultural season (remainder of the year other than Spring), EDCC produced anywhere from 300 to 500 tons/day worth of HDAN. [redacted] stated that during the month of September 2000, HDAN was produced at a rate of approximately 267 tons/day.

[redacted] stated that LDAN was produced at a rate of 14,137 tons per month (471 tons per day). [redacted] stated that a rate approaching 650 tons/day was possible under optimal conditions.

[redacted] stated that when the weather was extremely hot it was very difficult to produce large quantities of AN. [redacted] stated that the heat interferes with EDCC's ability to dry out AN. This brings about an undesirably high, moisture content. The AN then becomes "caked" (compressed) and very difficult to unload.

[redacted] stated EDCC consistently attempted to ship dry AN loads for ease in off-loading by recipients. [redacted] stated that AN off-loading is most effective when AN "flowed like water."

[redacted] stated ECC orders were reflected in computer data bases on invoiced order reports. [redacted] stated that physical inventories were based on such reports at the distributor level.

[redacted] stated that LSB, Inc, Oklahoma, City, OK (parent company of EDCC and ECC) initiated, via LSB's Internal Audit Department (IAD), an audit of each of its subsidiaries/locations.

[redacted] stated ECC conducted monthly physical audits as a matter of common practice. [redacted] stated EDCC can verify the amount sent to ECC each month. [redacted] stated EDCC's Rockwall, Texas distributor can determine what has been sold.

[redacted] identified [redacted] as the EDCC, Rockwall, Texas, point of contact. [redacted] also provided the name of [redacted] telephone [redacted] as an LSB point of contact regarding profit. [redacted]

[redacted] stated that an unaccounted for amount of AN on the scale of one hundred forty three (143) tons, was not a common "write off" (acceptable) loss.

[redacted] stated that AN was usually shipped in "hopper" (rail) cars, via the UNION PACIFIC (UP) Railway. [redacted] provided a weight range of ninety-five (95) to one-hundred (100) tons.

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/06/2000

3

[redacted] stated that AN was also shipped by truck. [redacted] stated that either "grain" or "pneumatic" trailer types were employed for AN shipment by truck.

[redacted] stated that in the former circumstance, ECC used a "screw auger" to off-load trucked AN and place same within the EC component bins. [redacted] stated in the case of the pneumatic trailer, air pressure was used to force the AN into a bin.

[redacted] stated that twenty-four to twenty-five ton shipments were commonly trucked to various EDCC distributors (to include ECC). [redacted] stated the various distributors were usually billed on six (6) month cycles.

[redacted] stated that ECC, depending upon the blend specified by a particular farmer, mixed AN with a specific amount of potash and "DEP", to provide ideal fertilizers for each field/crop.

[redacted] stated that ECC weighed each component of a particular blend prior to mixing and loading the final product (fertilizer). [redacted] stated that that weight was then subtracted from the ECC inventory in order to keep tabs on the amount of components remaining.

[redacted] stated that in order to maintain AN customer loyalty/business distributors commonly provided the AN equivalent of a "baker's dozen". [redacted] stated this practice helped both their future sales, and the farmer in need of fertilizer for his crops.

[redacted] stated that a negligible amount (loss) may not be reflected in the resultant distributor invoice through this practice.

[redacted] also stated that using a loader to transport fertilizer components from bin to mixer, at the distributor level, results in spillage beneath the loader.

This spillage gets repeatedly run over/crushed from the many loader trips to and from the bins. Both the donated and spillage AN was commonly written off on an annual basis. [redacted] stated that over the period of one year a write off ranging from fifteen to twenty tons was common.

[redacted] was candid and cooperative throughout the course of this interview. [redacted] was amenable to future contact by the FBI.

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/06/2000

[redacted] work address 3100
East Covell, Edmond, Oklahoma, 73034; work telephone numbers [redacted]
[redacted] Social Security Account Number:
[redacted] employed as an [redacted] for LSB Industries of
Oklahoma City, Oklahoma, the parent company of El Dorado Chemical
Company (ECC) was interviewed at the ECC facility in Waxahachie,
Texas. After being advised of both the identity of the interviewing agents and the nature of the interview,
provided the following information:

[redacted] was interviewed regarding an alleged theft of 143
tons of Ammonium Nitrate (AN) fertilizer from the ECC facility in
Waxahachie. [redacted] conducted the most recent annual audit of ECC
Waxahachie on June 15, 2000. On that date, [redacted] found that the
facility was short of a number of products, the most notable being
the AN. [redacted] conducted last years audit of ECC Waxahachie in
July of 1999, as well. During that audit [redacted] found no
significant shortages or errors in quantities. [redacted] advised
that a facility the size of ECC Waxahachie could potentially have a
discrepancy of 10 tons of AN based mostly on measuring errors at
the facility.

[redacted] was at ECC Waxahachie on instant date to conduct
another audit due to a recent managerial change at the facility.
[redacted] described his auditing procedures including a tour of the
facilities storage areas. [redacted] showed the interviewing agents
the ninety-ton bins that house the bulk fertilizer sold at ECC
facilities. [redacted] stated that he physically measures the amounts
of fertilizer in the bins during his auditing procedures and then
reconciles those measured amounts against shipping and receiving
documents.

[redacted] stated that ECC has a production facility in El
Dorado, Arkansas that produces the Agricultural grade fertilizers
that are distributed at ECC Waxahachie. Further, he stated that
ECC produces some "explosive grade" products, including AN, that
are distributed in facilities in Kentucky. [redacted] advised that to
his knowledge, ECC Waxahachie does not receive any "explosive
grade" fertilizer. [redacted] does not know what the difference is
between the agricultural and explosive type fertilizers.

Investigation on 10/06/2000 at Waxahachie, TexasFile # 266A-DL-88532-3by SA1/istDate dictated 10/06/2000280 JST 01.302MDW/DB

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/06/2000 , Page

2

[redacted] does not know how the AN could be missing, but thinks it could have been sold "out the back" of the store by some former employees. [redacted] advised that [redacted] was the former [redacted] before the current [redacted] was hired. [redacted] apparently left ECC Waxahachie on good terms in June 2000, having cited a "better job offer" as the reason to [redacted]. [redacted] stated that the [redacted] is [redacted]. [redacted] further advised that ECC Waxahachie has had some break-ins in the past where items were stolen. These break-ins were allegedly reported to the Waxahachie Police Department. [redacted] does not believe that 143 tons of AN could have been stolen this way, as he described a half ton pickup truck as only being able to hold roughly a half ton in its bed. [redacted] indicated that it would have taken literally hundreds of such attempts to steal 143 tons of AN.

[redacted] agreed to be interviewed again in this matter and further to provide any documentation deemed necessary to the investigation to support the audit results. [redacted] had nothing further to provide at this time.

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/06/2000

[redacted], birth date [redacted]
[redacted] Texas Drivers License [redacted] residing at [redacted]

[redacted] employed by EL DORADO CHEMICAL COMPANY, 1950 Alpha Road,
Suite 100, Rockwall, Texas 75087, telephone [redacted] was
interviewed at the EL DORADO CHEMICAL COMPANY, 111 North
Getzendaner Street, Waxahachie, Texas 75165, telephone [redacted]

[redacted] After being advised of the identity of the interviewing
agents and the nature of the interview, he provided the following
information:

[redacted] indicated he was the [redacted]
[redacted] for the EL DORADO CHEMICAL COMPANY with the company's
headquarters located in Rockwall, Texas. EL DORADO CHEMICAL
COMPANY sells Ammonium Nitrate fertilizer, pesticides and
insecticides in bulk to farmers. [redacted] described the breakdown of
customers as fifty percent farmers and forty to fifty percent were
individuals who owned acreage and have other primary jobs. [redacted]
described normal shortages to be one half of one percent usually
due to product shrinkage. The missing product for this inquiry
accounts for about ten percent of a shortage which was very
unusual. The company wrote off about \$47,000.00 in product after
the annual inventory.

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[redacted] stated an inventory determined one hundred fifty
four (154) tons of Ammonium Nitrate (AN) at thirty four percent was
missing. [redacted] explained this amount to be about one and a half
railroad cars of AN. [redacted] stated the Plant Manager had the
responsibility to conduct a monthly inventory of product and
provide the inventory to the headquarters in Rockwall, Texas.
According to [redacted] there was no indication from the monthly
inventories that any product was missing in large quantities. The
annual physical inventory from the El Dorado Chemical Company
parent company, LSB Industries, located in Oklahoma City, Oklahoma,
was conducted in July 2000. The Plant Manager for the year prior
to the annual inventory resigned in June 2000. [redacted] indicated
[redacted] was the [redacted] for the inventory from July 1999
until his resignation. [redacted] did not believe [redacted] had anything
to do with the missing product stating, [redacted] did not have a

Investigation on 10/05/2000 at Waxahachie, TexasFile # 266A-DL-88532 4 Date dictated 10/06/2000by SA hMOT
SA hMOT
266A-DL-88532

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/05/2000 , Page 2

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[redacted] crooked bone in his body." [redacted] indicated [redacted] lived at [redacted]
[redacted].

Before resigning, [redacted] complained of having problems with an employee named [redacted] was described as being about forty five years old while [redacted] was considerably younger. [redacted] would apparently make as though he did not hear directions given by [redacted] immediate supervisor. [redacted] would often answer questions directed at him as "I don't know." [redacted] provided a recent example when he asked [redacted] some questions about a truck's fuel consumption in which [redacted] was the primary operator. [redacted] could not explain using four hundred more dollars more than normal during the month of August 2000. [redacted] primary response to [redacted] questions were "I don't know." [redacted] was leaning up against a wall during the questioning and by the end of the questioning he was sitting on the floor. [redacted] also provided some information [redacted] was selling restricted chemicals to those without the proper licenses. [redacted] was told by the current Plant Manager of an incident in which an unknown man wanted to buy a pesticide but was told he could not as he did not have the proper license. The man claimed he had bought it there before. [redacted] stated the present Plant Manager then saw [redacted] walking away from the office during this conversation as if to get away from the incident. [redacted] was hired at the Waxahachie, Texas location in January 1998 by [redacted] the [redacted] before [redacted]

[redacted] described [redacted] as a farm boy from Kansas whose family would travel the country harvesting crops. [redacted] drove a truck during the winter months after the harvest season before his employment with the El Dorado Chemical Company. [redacted] met his [redacted] in Waxahachie, Texas, after [redacted] moved to Texas from New Jersey. [redacted] made the move with her mother to be close to the leader of the Church of God in Waxahachie, Texas. WOLFE had an occasion to talk to [redacted] on several occasions and learned neither she nor [redacted] believed in using medical doctors for any medical conditions. [redacted] and [redacted] have on occasion drank lemon juice and cayenne pepper in celebration of an unspecified religious observation.

[redacted] did not know much about [redacted] as he had only worked at the location for about one month. [redacted] was the mechanic and worked in the "Plant" building adjacent to the office building.

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Continuation of FD-302 of [redacted]

, On 10/05/2000 , Page 3

[redacted] stated [redacted], the [redacted] and [redacted] telephoned the new Plant Manager on September 29, 2000 and asked for the following day (Friday) off for religious reasons. The manager told them they could not have that day off and if they did not show up he would presume that they resigned. The four individuals did not come to work and cited previously to the manager they needed the day off because of the "full moon." Before their resignation, [redacted], the [redacted] and [redacted] had access to the entire Waxahachie Facility or night [redacted] the [redacted] and [redacted] told [redacted] they could not work on Saturdays as it was the Sabbath in their beliefs. All four individuals were members of the Church of God in Waxahachie, Texas.

[redacted] stated a large "buggy" was also missing from the facility. The "buggy" was a double axle fertilizer spreader capable of holding 10,000 pounds of product. [redacted] indicated the trailer (buggy) had a brand name of Wilmer, model 500. [redacted] stated a three quarter truck could pull a "buggy" as this was what farmers would use until the spreader was brought to the fields.

[redacted] stated forty three (43) tons of Diammonium Phosphate (DAP) and ten (10) to twelve (12) tons of Ammonium Sulfate were not accounted for after the inventory.

[redacted] was questioned as to [redacted], the [redacted] and [redacted] knowledge of the annual inventory. [redacted] stated all four individuals knew the inventory took place and the results would be pending. [redacted] provided the name of [redacted] as the point of contact for the Personnel Department in El Dorado, Arkansas, at [redacted]

[redacted] was asked what he thought happened to all the product. [redacted] replied he thought the product was prepared for farmers but not invoiced. [redacted] explained that in this scenario the farmer would get the product but the company would not get paid, therefore accounting for the shortage.



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1801 N. Lamar, Ste 300

Dallas, Texas 75202-1795
214-720-2200
October 6, 2000

Attention: El Dorado Chemical Company

[REDACTED]
Re: Request for Employment Information

Dear [REDACTED]

The Dallas Division of the Federal Bureau of Investigation is currently investigating the whereabouts of a large quantity of missing fertilizer from the El Dorado Chemical Company's Waxahachie, Texas, location. The Dallas Division of the Federal Bureau of Investigation received information several former employees recently left your company abruptly.

To further the investigation, your assistance is requested in obtaining employment information concerning [REDACTED] and [REDACTED] per [REDACTED] a previous telephone conversation with Special Agent [REDACTED]. Any additional questions can also be directed to Special Agent [REDACTED] at telephone number (214) 922-7709.

We would like to thank you in advance for your assistance.

Sincerely yours,

Danny A. Defenbaugh
Special Agent In Charge

[REDACTED]

By:

[REDACTED]
Supervisory Special Agent

266A-DL-8863D-5

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DATE 12-11-2009 BY 60324 uc baw/sab/lsg

-1-

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 10/11/2000

[redacted] El Dorado Chemical Company, 4500 Northwest Avenue, El Dorado, Arkansas 71731, [redacted]
[redacted], provided a facsimile copy of the Education and Employment History section of the employment application used by EL DORADO CHEMICAL COMPANY pertaining to [redacted]
[redacted] and [redacted]
[redacted] apparently worked as a [redacted]
[redacted] before being employed with EL DORADO CHEMICAL COMPANY.

[redacted] apparently was employed as a [redacted]
[redacted] before being employed with EL DORADO CHEMICAL COMPANY.

[redacted] apparently was employed previously by [redacted]
[redacted] before being employed with EL DORADO CHEMICAL COMPANY.

[redacted] was apparently employed previously by [redacted]
[redacted] before being employed with EL DORADO CHEMICAL COMPANY.

Copies of the Education and Employment History section of the employment application used by EL DORADO CHEMICAL COMPANY are attached hereto with the original facsimile being placed into FD 340 envelope.

Investigation on 10/06/2000 at Dallas, Texas (via facsimile)

File # 266A-DL-88532 *to* Date dictated 10/11/2000

by SA [redacted] *NH*

285 Mfhol. 302

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Copy to Agent [redacted]

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DATE 12-11-2009 BY 60324 uc baw/sab/lsg

Phone: 870-863-1400 Fax: 870-863-1471
4500 NORTHWEST AVE. P.O. BOX 231
EL DORADO, AR 71731

EL DORADO
CHEMICAL
COMPANY

Fax

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To: _____ From: _____

Fax: 214-922-7730 Pages: 4 + cover

Phone: _____ Date: 10-6-00

Re: Phone request CC: _____

Urgent For Review Please Comment Please Reply Please Recycle

If I can help in any other way, just let me know!

_____ b6
b7C

APPLICANT NAME _____

1-19-98
DATE OF APPLICATIONb6
b7c

EDUCATION	NAME OF SCHOOL	LOCATION (CITY, STATE)	CIRCLE LAST YEAR COMPLETED	DEGREE
	GRADE SCHOOL		1 2 3 4 5 6 7 <input checked="" type="radio"/> 8	
	HIGH SCHOOL		9 10 11 <input checked="" type="radio"/> 12	H.S. Diploma
	COLLEGE		1 2 3 4 5 6	
OTHER				

Please give accurate, complete full-time and part-time employment record. Start with present or most recent employer.

1			
2			
3	Company Name	Telephone () —	
	Address	Employed (Month and Year) From To	
	Name of Supervisor	Hourly Pay Start Last	
	State Job Title and Describe Your Work	Reason For Leaving	
		Name Under Which Employed	
4	Company Name	Telephone () —	
	Address	Employed (Month and Year) From To	
	Name of Supervisor	Hourly Pay Start Last	
	State Job Title and Describe Your Work	Reason For Leaving	
		Name Under Which Employed	

WE WILL CONTACT THE EMPLOYERS LISTED ABOVE UNLESS YOU INDICATE THOSE YOU DO NOT WANT US TO CONTACT.
DO NOT CONTACT Employer Number(s) _____ Reason _____

The information provided in this Application for Employment is true, correct and complete. If employed, any misstatement or omission of fact on this application will result in my immediate dismissal.

I understand that acceptance of an offer of employment does not create a contractual obligation upon the Company to continue to employ me in the future. I understand that I am an Employee-at-Will.

Permission is hereby granted to any person, firm or corporation, whether my former employer or not, to give the Company or its authorized representative at any time full information pertaining to my working ability, attendance, job injuries, driving record, if applicable, and performance.

I understand and agree to submit to a post-employment offer medical/physical examination by a physician or clinic selected by the Company, which will include testing for drugs and/or alcohol. I also agree that I may be required, pursuant to the Company's Drug/Alcohol Abuse Policy, to submit to a drug and alcohol screening test and/or to a physical examination, at any time, by a physician or clinic selected by the Company.

If employed by this Company, I agree to abide by all rules of the Company.

1-19-98

X

Date

Signature

APPLICANT NAME _____

4-10-78

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DATE OF APPLICATION

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EDUCATION	NAME OF SCHOOL		LOCATION (CITY, STATE)	CIRCLE LAST YEAR COMPLETED	DEGREE
	GRADE SCHOOL			1 2 3 4 5 6 7 <input checked="" type="radio"/>	
	HIGH SCHOOL			8 9 10 11 <input checked="" type="radio"/>	
	COLLEGE			12 <input checked="" type="radio"/>	3 4 5 6
	OTHER				

EMPLOYMENT HISTORY

Please give accurate, complete full-time and part-time employment record. Start with present or most recent employer.

1	C	Telephone () —
	A	Empld From
Name of Supervisor		Hourly Pay Start Last
S		Reason For Leaving
Company Name		Name Under Which Employed
2	Address	Telephone () —
	Name of Supervisor	Employed (Month and Year) From To
State Job Title and Describe Your Work		Hourly Pay Start Last
		Reason For Leaving
Company Name		Name Under Which Employed
3	Address	Telephone () —
	Name of Supervisor	Employed (Month and Year) From To
State Job Title and Describe Your Work		Hourly Pay Start Last
		Reason For Leaving
Company Name		Name Under Which Employed
4	Address	Telephone () —
	Name of Supervisor	Employed (Month and Year) From To
State Job Title and Describe Your Work		Hourly Pay Start Last
		Reason For Leaving
Company Name		Name Under Which Employed

WE WILL CONTACT THE EMPLOYERS LISTED ABOVE UNLESS YOU INDICATE THOSE YOU DO NOT WANT US TO CONTACT.
 DO NOT CONTACT: Employer Number(s) _____ Reason _____

The information provided in this Application for Employment is true, correct and complete. If employed, any misstatement or omission of fact on this application will result in my immediate dismissal.

I understand that acceptance of an offer of employment does not create a contractual obligation upon the Company to continue to employ me in the future. I understand that I am an Employee-at-Will.

Permission is hereby granted to any person, firm or corporation, whether my former employer or not, to give the Company or its authorized representative at any time full information pertaining to my working ability, attendance, job injuries, driving record, if applicable, and performance.

I understand and agree to submit to a post-employment offer medical/physical examination by a physician or clinic selected by the Company, which will include testing for drugs and/or alcohol. I also agree that I may be required, pursuant to the Company's Drug/Alcohol Abuse Policy, to submit to a drug and alcohol screening test and/or to a physical examination, at any time, by a physician or clinic selected by the Company.

If employed by this Company, I agree to abide by all present and subsequently issued rules of the Company.

4-10-98

X

Date

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7-10-00

DATE OF APPLICATION

NAME OF SCHOOL GRADE SCHOOL HIGH SCHOOL COLLEGE OTHER	LOCATION (CITY, STATE)	CIRCLE LAST YEAR COMPLETED	DEGREE
		1 2 3 4 5 6 7 8	
		9 10 11 12	
		1 2 3 4 5 6	
Part-time			

Please give accurate, complete full-time and part-time employment record. Start with present or most recent employer.

EMPLOYMENT HISTORY

1

2

3

4

Telephone	
()	
Employed (Month and Year)	
From	To
Hourly Pay	
Start	Last
Reason For Leaving	
Name Under Which Employed	

WE WILL CONTACT THE EMPLOYERS LISTED ABOVE UNLESS YOU INDICATE THAT YOU DO NOT WANT US TO CONTACT.
DO NOT CONTACT: Employer-Number(s) Reason

The information provided in this Application for Employment is true, correct and complete. If employed, any misstatement or omission of fact on this application will result in my immediate dismissal.

I understand that acceptance of an offer of employment does not create a contractual obligation upon the Company to continue to employ me in the future. I understand that I am an Employee-at-Will.

Permission is hereby granted to any person, firm or corporation, whether my former employer or not, to give the Company or its authorized representative at any time full information pertaining to my working ability, attendance, job injuries, driving record, if applicable, and performance.

I understand and agree to submit to a post-employment offer medical/physical examination by a physician or clinic selected by the Company, which will include testing for drugs and/or alcohol. I also agree that I may be required, pursuant to the Company's Drug/Alcohol Abuse Policy, to submit to a drug and alcohol screening test and/or to a physical examination, at any time, by a physician or clinic selected by the Company.

If employed by this Company, I agree to _____ and to abide by the rules and regulations of the Company.

8-4-00

Date

APPLICANT NAME

LAST

FIRST

DATE OF APPLICATION

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b7C

EDUCATION	GRADE SCHOOL	LOCATION (CITY STATE)	CIRCLE LAST YEAR COMPLETED	DEGREE
	HIGH SCHOOL		1 2 3 4 5 6 7 8	
	COLLEGE		9 10 11 12	
	OTHER		1 2 3 4 5 6	

EMPLOYMENT HISTORY

Please give accurate, complete full-time and part-time employment record. Start with present or most recent employer.

1	COMPANY	POSITION	EMPLOYER
2	COMPANY	POSITION	EMPLOYER
3	COMPANY	POSITION	EMPLOYER
4	COMPANY	POSITION	EMPLOYER

WE WILL CONTACT THE EMPLOYERS LISTED ABOVE UNLESS YOU INDICATE THAT YOU WANT US TO CONTACT.
DO NOT CONTACT: Employer Number(s) _____ Reason _____

The information provided in this Application for Employment is true, correct and complete. If employed, any misstatement or omission of fact on this application will result in my immediate dismissal.

I understand that acceptance of an offer of employment does not create a contractual obligation upon the Company to continue to employ me in the future. I understand that I am an Employee-at-Will.

Permission is hereby granted to any person, firm or corporation, whether my former employer or not, to give the Company or its authorized representative at any time full information pertaining to my working ability, attendance, job injuries, driving record, if applicable, and performance.

I understand and agree to submit to a post-employment offer medical/physical examination by a physician or clinic selected by the Company, which will include testing for drugs and/or alcohol. I also agree that I may be required, pursuant to the Company's Drug/Alcohol Abuse Policy, to submit to a drug and alcohol screening test and/or to a physical examination, at any time, by a physician or clinic selected by the Company.

If employed by this Company, I agree to abide by all rules of the Company.

8-20-2000

X

Date

Signature

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/16/2000

The following investigation was conducted by
SA [redacted] and SA [redacted] on 10/13/2000 and
10/15/2000 in Palmer, TX:

On 10/13/2000, agents, through research of postal address changes at the Waxahachie, TX Post Office, located the following address for [redacted]
[redacted]

During spot checks of referenced address on 10/13/2000 and 10/15/2000, agents observed the residence to be a one-story brick ranch-style dwelling enclosed by fencing and a front gate approximately 50 meters from the front of the structure. Agents also observed a large wooden storage shed approximately 100 meters from the rear of the residence.

Agents observed a white panel truck parked in front of the wooden storage shed, however, the truck did not display a front or back license plate. Additionally, the truck appeared to have been stationary for quite some time as the grass around the truck was significantly higher than the remainder of the property.

Investigation on 10/13/2000 at Palmer, TX

File # 2 Date dictated 10/16/2000
by S S MAC

290mac01, 302

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FEDERAL BUREAU OF INVESTIGATION

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b7CDate of transcription 10/16/2000

Sergeant [redacted] and Sergeant [redacted] both of the ELLIS COUNTY SHERIFFS OFFICE, 300 South Jackson, Waxahachie, Texas 75165, (972) 923-4919, provided the following information concerning the management of the EL DORADO CHEMICAL COMPANY facility located at 111 North Getzendaner Street, Waxahachie 75165:

Both [redacted] and [redacted] advised that the EL DORADO CHEMICAL COMPANY facility in Waxahachie, Texas, has had a history of poor and transient management. [redacted] and [redacted] indicated [redacted] and the [redacted] were all employed as the [redacted] of the EL DORADO CHEMICAL COMPANY facility in Waxahachie, Texas. [redacted] and [redacted] provided an address and telephone number for [redacted] as [redacted] was believed to be an [redacted] somewhere in the area. [redacted] was believed to live somewhere in Navarro County, Texas with his [redacted] located on Texas [redacted]. Neither [redacted] nor [redacted] could remember the first of [redacted] but stated his father [redacted] in Waxahachie, Texas.

[redacted] and [redacted] also provided the names of Chief Deputy [redacted] with the WAXAHACHIE POLICE DEPARTMENT (WPD), College Street, Waxahachie, Texas, (972) 937-4320, as point of contact within WPD.

Investigation on 10/12/2000 at Waxahachie, TexasFile # 266A-DL-88532 *8* Date dictated 10/16/2000by SA [redacted] *MAC* SA [redacted] *MTH**Z89mjh02.302*

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DATE 12-11-2009 BY 60324 uc baw/sab/lsg

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/16/2000

Source, who is not in a position to testify, provided the following information:

Source advised that CHURCH OF GOD EVANGELISTIC
ASSOCIATION (COG) [redacted] on [redacted]

[redacted] was identified by source as [redacted] b6
[redacted] b7C

Source stated [redacted] attended HARDING COLLEGE in Searcy (phonetic), Arkansas and graduated in 1965. Source described HARDING COLLEGE as affiliated with the CHURCH OF CHRIST in Missouri. Source stated that [redacted] claimed he was ordained as a Prophet in 1980 after studying 14 years of Biblical prophecy.

Source further advised that prior to arriving in Texas in the 1990's, [redacted] was located in Bridgeton, MO and maintained a post office box in St. Ann, MO. Source described the locations as in the western suburbs of St. Louis, MO. Source informed writer he/she would provide further information on [redacted] at a later date.

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Investigation on 10/11/2000 at Dallas, TX (telephonically)

File # 266A-DL-88532 9 Date dictated 10/16/2000

by SA MAC

290 Mac02, 302

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266A-DL-88532-7

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FEDERAL BUREAU OF INVESTIGATION

b6
b7CDate of transcription 10/16/2000

Social Security Account
Number (SSAN) [redacted] residing at [redacted]
[redacted] telephone number [redacted] was interviewed
at her place of employment, EL DORADO CHEMICAL COMPANY (EDC),
1950 Alpha Road, Suite 100, Rockwall, TX 75087. After being
advised of the identities of the interviewing agents and the
purpose of the interview, she provided the following information:

[redacted] advised agents she was employed by EDC as a
[redacted] and was aware of the missing
ammonium nitrate (AN) from the Waxahachie, TX EDC site. [redacted]
stated she was not aware of the details of the missing AN but knew
from discussions with other EDC employees that it appeared that
numerous orders/loads were not invoiced correctly in Waxahachie and
this might account for the missing AN.



[redacted] described that shipments of AN were shipped from
the production facility in Arkansas to Waxahachie in railroad cars.
She further advised that AN is routinely lost or unaccounted for
due to spillage and normal business attrition. [redacted] stated that
measurements for tons are routinely rounded to the nearest ton due
to the method of storage which is usually in large bins.

When asked by agents if she had heard discussions among
EDC employees relating to four (4) EDC employees quitting at the
same time, [redacted] advised that she had heard a little. She stated
that [redacted] EDC [redacted] and [redacted]
[redacted] both quit in June of 2000. [redacted] related that
[redacted] and [redacted]
had all resigned ... from the "Waxahachie site
over their inability to obtain a day off due to a full moon. She
advised she did not know any of the four personally and that [redacted]
[redacted] had only worked at the Waxahachie site for about three (3)
weeks. [redacted] stated she had heard the four (4) were members of a
church in Waxahachie which was similar to the SEVENTH DAY ADVENTIST
CHURCH.

Investigation on 10/11/2000 at Rockwall, TXFile # 266A-DL-88532-10 Date dictated 10/16/2000
SA [redacted] MA
by SA [redacted]

290mac03.302

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/11/2000 , Page

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[redacted] was amenable to further contact and provided eight (8) EDC inventory related reports to agents. The reports were retained by agents, with originals being placed in a 1A envelope and copies attached hereto and made a permanent part of this FD-302.

Referenced EDC reports concerning AN, dating from 10/01/1999 through 10/11/2000, were numbered by agents and classified by [redacted] as follows:

1. Invoicing/Buyers
2. Transfers to EDC Locations
3. Physical Adjustments
4. Adjustments
5. Shipments from El Dorado to Waxahachie
6. Transfers Received from EDC Locations
7. Adjustments/Missing Report
8. Invoices

El Dorado Chemical Co
TRANSACTION REGISTER

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b6
b7CInvoicing
Buyers

#1

PRODUCT / DESCRIPTION TYP WHS DATE REF.	USER	QUANTITY	TOTAL	TYP WHS DATE REF.	USER	QUANTITY	TOTAL
52090 E-2 AMMONIUM NITRATE				CLASS 1 U/M NT			
IF 57 10/04/99 6782 OB0146		.634-	.634	IN 57 10/04/99576798 OB0146		.634	.000
IN 57 10/05/99 576805 OB0146		.750	.750-	IN 57 10/05/99576809 OB0146		.253	1.003-
IN 57 10/06/99 576811 OB0146		4.567	5.570-	IN 57 10/11/99576821 OB0146		1.053	6.623-
IN 57 10/12/99 576828 OB0146		5.785	12.408-	IN 57 10/12/99576829 OB0146		.469	12.877-
IN 57 10/14/99 576833 OB0146		1.522	14.399-	IN 57 10/14/99576840 OB0146		.423	14.822-
IN 57 10/18/99 576844 OB0146		4.513	19.335-	IN 57 10/18/99576845 OB0146		1.522	20.857-
IN 57 10/18/99 833 OB0146		1.522-	19.335-	IN 57 10/18/99576846 OB0146		2.502	21.837-
IN 57 10/18/99 6770 OB0146		.446-	21.391-	IN 57 10/18/99576848 OB0146		.203	21.594-
IN 57 10/20/99 576855 OB0146		.355	21.949-	IN 57 10/21/99576857 OB0146		3.500	25.449-
IN 57 10/21/99 576858 OB0146		.324	25.773-	IN 57 10/22/99576859 OB0146		3.090	28.863-
IN 57 10/23/99 576867 OB0146		.148	29.011-	IN 57 10/24/99576871 OB0146		4.872	33.883-
IN 57 10/27/99 576876 OB0146		.812	34.695-	IN 57 10/28/99576880 OB0146		.507	35.202-
IN 57 10/29/99 576890 OB0146		.855	36.057-	IN 57 10/29/99576895 OB0146		.812	36.869-
IN 57 10/29/99 576901 OB0146		7.308	44.177-	IN 57 10/29/99576902 OB0146		2.820	46.997-
IN 57 10/29/99 576903 OB0146		1.000	47.997-	IN 57 10/29/99576904 OB0146		1.413	49.410-
IN 57 11/01/99 576907 OB0146		2.820	52.230-	IN 57 11/01/99 895 OB0146		.812-	51.418-
IN 57 11/01/99 902 OB0146		2.820-	48.598-	IN 57 11/03/99576916 OB0146		1.218	49.816-
IN 57 11/03/99 576917 OB0146		1.218	51.034-	IN 57 11/03/99576918 OB0146		.855	51.889-
IN 57 11/03/99 .890 OB0146		.855-	51.034-	IN 57 11/03/99576919 OB0146		1.314	52.348-
IN 57 11/03/99 576920 OB0146		2.629	54.977-	IN 57 11/03/99 657 OB0146		4.182-	50.795-
IN 57 11/03/99 576922 OB0146		3.179	53.974-	IN 57 11/03/99576923 OB0146		1.568	55.542-
IN 57 11/04/99 576924 OB0146		1.250	56.792-	IN 57 11/04/99576925 OB0146		1.250	58.042-
IN 57 11/04/99 576930 OB0146		1.218-	56.824-	IN 57 11/04/99576931 OB0146		.892	57.716-
IN 57 11/05/99 924 OB0146		1.250-	56.466-	IN 57 11/05/99576932 OB0146		.706	57.172-
IN 57 11/05/99 576933 OB0146		15.250	72.422-	IN 57 11/05/99576934 OB0146		4.000	76.422-
IN 57 11/05/99 576938 OB0146		.750	77.172-	IN 57 11/05/99576939 OB0146		3.127	80.299-
IN 57 11/06/99 576943 OB0146		6.000	86.299-	IN 57 11/06/99576945 OB0146		.203	86.502-
IN 57 11/08/99 576945 OB0146		1.217	87.719-	IN 57 11/08/99576948 OB0146		2.856	90.575-
IN 57 11/08/99 576951 OB0146		9.150	99.725-	IN 57 11/08/99576952 OB0146		.913	100.638-
IN 57 11/08/99 576954 OB0146		3.000	103.638-	IN 57 11/08/99576955 OB0146		4.500	108.138-
IN 57 11/09/99 952 OB0146		.913-	107.225-	IN 57 11/09/99576957 OB0146		.456	107.681-
IN 57 11/09/99 576960 OB0146		9.000	116.681-	IN 57 11/10/99576964 OB0146		9.000	125.681-
IN 57 11/10/99 576965 OB0146		9.000	134.681-	IN 57 11/11/99576966 OB0146		.556	135.237-
IN 57 11/11/99 576968 OB0146		4.000	139.237-	IN 57 11/12/99576970 OB0146		17.500	156.737-
IN 57 11/15/99 576974 OB0146		1.605	158.342-	IN 57 11/15/99576977 OB0146		14.000	172.342-
IN 57 11/16/99 576975 OB0146		1.218	173.560-	IN 57 11/17/99576981 OB0146		15.000	188.560-
IN 57 11/18/99 576983 OB0146		1.000	189.560-	IN 57 11/18/99576984 OB0146		.789	190.349-
IN 57 11/18/99 948 OB0146		.2.856-	187.493-	IN 57 11/18/99576987 OB0146		2.856	190.349-
IN 57 11/19/99 576988 OB0146		4.000	194.349-	IN 57 11/19/99576990 OB0146		1.278	195.627-
IN 57 11/19/99 576993 OB0146		.166	195.793-	IN 57 11/20/99576996 OB0146		1.668	197.461-
IN 57 11/20/99 576997 OB0146		4.000	201.461-	IN 57 11/22/99576999 OB0146		.478	201.939-
IN 57 11/22/99 577000 OB0146		2.500	204.439-	IN 57 11/22/99577001 OB0146		1.000	205.439-
IN 57 11/22/99 577002 OB0146		.202	205.641-	IN 57 11/22/99577003 OB0146		.208	205.849-
IN 57 11/22/99 577004 OB0146		7.000	212.849-	IN 57 11/22/99577007 OB0146		5.750	218.599-
IN 57 11/22/99 577008 OB0146		.202	218.801-	IN 57 11/22/99577009 OB0146		.478	219.279-
IN 57 11/24/99 577013 OB0146		1.000	220.279-	IN 57 11/24/99577016 OB0146		.202	220.481-
IN 57 11/24/99 577016 OB0146		5.700	226.181-	IN 57 11/30/99577020 OB0146		4.000	230.181-
IN 57 12/01/99 577028 OB0146		.175	230.356-	IN 57 12/01/99577027 OB0146		1.500	231.856-
IN 57 12/02/99 577028 OB0146		2.000	233.856-	IN 57 12/02/99577029 OB0146		2.000	235.856-
IN 57 12/02/99 27 OB0146		1.500-	234.356-	IN 57 12/02/99577030 OB0146		3.982	238.338-

QTY
Ordered

AC Cumulation

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El Dorado Chemical Co
TRANSACTION REGISTER

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PRODUCT / DESCRIPTION	TYP	WHS	DATE	REF.	USER	QUANTITY	TOTAL	TYP	WHS	DATE	REF.	USER	QUANTITY	TOTAL
IN 57 12/02/99 577031 OB0146						4.000	242.338-	IN 57 12/03/99577033 OB0146					3.250	245.588-
IN 57 12/06/99 577034 OB0146						2.000	247.588-	IN 57 12/28/99577038 OB0146					4.000	251.588-
IN 57 12/28/99 577039 OB0146						2.850	254.438-	IN 57 12/29/99577040 OB0146					.761	255.199-
IN 57 12/29/99 577041 OB0146						3.500	258.699-	IN 57 12/30/99577042 OB0146					1.500	260.199-
IN 57 1/04/00 577044 OB0146						2.000	262.199-	IN 57 1/07/00577048 OB0146					4.000	266.199-
IN 57 1/10/00 577050 OB0146						10.750	276.949-	IN 57 1/10/00577053 OB0146					6.768	283.717-
IN 57 1/11/00 577054 OB0146						2.500	286.217-	IN 57 1/17/00577056 OB0146					2.000	288.217-
IN 57 1/18/00 577060 OB0146						4.000	292.217-	IN 57 1/18/00577061 OB0146					.202	292.419-
IN 57 1/18/00 577062 OB0146						.405	292.824-	IN 57 1/18/00577063 OB0146					.507	293.331-
IN 57 1/18/00 .26 OB0146						.175-	293.156-	IN 57 1/18/00 .623 OB0146					2.006-	291.150-
IN 57 1/18/00 577066 OB0146						2.850	294.000-	IN 57 1/19/00577068 OB0146					2.000	296.000-
IN 57 1/21/00 577070 OB0146						8.550	304.550-	IN 57 1/21/00577071 OB0146					2.000	306.550-
IN 57 1/24/00 577073 OB0146						2.000	308.550-	IN 57 1/25/00577074 OB0146					32.697	341.247-
IN 57 1/25/00 577075 OB0146						10.725	351.972-	IN 57 1/25/00577076 OB0146					3.445	355.417-
IN 57 1/25/00 577077 OB0146						5.500	360.917-	IN 57 1/25/00577078 OB0146					2.255	363.172-
IN 57 1/25/00 577079 OB0146						1.725	364.897-	IN 57 1/25/00577080 OB0146					6.218	371.115-
IN 57 1/26/00 .73 OB0146						2.000-	369.115-	IN 57 1/26/00577083 OB0146					1.000	370.115-
IN 57 1/26/00 577084 OB0146						2.000	372.115-	IN 57 1/31/00577087 OB0146					1.500	373.615-
IN 57 1/31/00 577088 OB0146						4.400	378.015-	IN 57 2/01/00577096 OB0146					32.697	410.712-
IN 57 2/01/00 577098 OB0146						32.697-	378.015-	IN 57 2/03/00577101 OB0146					1.250	379.265-
IN 57 2/04/00 577102 OB0146						4.913	384.178-	IN 57 2/07/00577103 OB0146					1.450	385.628-
IN 57 2/07/00 577104 OB0146						.752	386.380-	IN 57 2/10/00 .87 OB0146					1.500-	384.880-
IN 57 2/10/00 577109 OB0146						2.000	386.880-	IN 57 2/11/00577110 OB0146					2.500	389.380-
IN 57 2/11/00 577111 OB0146						2.500	391.880-	IN 57 2/12/00577115 OB0146					.846	392.726-
IN 57 2/14/00 577117 OB0146						10.575	403.301-	IN 57 2/14/00577118 OB0146					.617	403.918-
IN 57 2/16/00 577121 OB0146						1.150	405.068-	IN 57 2/16/00577122 OB0146					1.692	406.760-
IN 57 2/16/00 577123 OB0146						1.015	407.775-	IN 57 2/17/00577126 OB0146					2.175	409.950-
IN 57 2/17/00 577127 OB0146						.846	410.796-	IN 57 2/18/00577131 OB0146					2.224	413.020-
IN 57 2/18/00 577132 OB0146						5.000	418.020-	IN 57 2/19/00577134 OB0146					2.224	420.244-
IN 57 2/19/00 577135 OB0146						.771	421.015-	IN 57 2/19/00577136 OB0146					2.439	423.454-
IN 57 2/21/00 577137 OB0146						4.000	427.454-	IN 57 2/21/00577138 OB0146					1.128	428.582-
IN 57 2/21/00 577141 OB0146						3.000	431.582-	IN 57 2/21/00577143 OB0146					1.500	433.082-
IN 57 2/22/00 577144 OB0146						.912	433.994-	IN 57 2/22/00577146 OB0146					.456	434.450-
IN 57 2/22/00 577147 OB0146						2.500	436.950-	IN 57 2/22/00577148 OB0146					1.500	438.450-
IN 57 2/28/00 577155 OB0146						62.604	501.054-	IN 57 2/29/00577163 OB0146					1.692	502.746-
IN 57 2/29/00 577164 OB0146						2.500-	500.246-	IN 57 2/29/00577166 OB0146					4.000	504.246-
IN 57 2/29/00 577167 OB0146						.339	504.585-	IN 57 2/29/00577174 OB0146					5.000	509.585-
IN 57 2/29/00 577176 OB0146						7.402	516.987-	IN 57 3/01/00577177 OB0146					1.112	518.099-
IN 57 3/01/00 577178 OB0146						.187	518.286-	IN 57 3/01/00577179 OB0146					.834	519.120-
IN 57 3/01/00 577180 OB0146						9.000	528.120-	IN 57 3/01/00577183 OB0146					1.000	529.120-
IN 57 3/01/00 577184 OB0146						.611	529.731-	IN 57 3/01/00577185 OB0146					.054	529.785-
IN 57 3/01/00 577186 OB0146						4.431	534.216-	IN 57 3/02/00577188 OB0146					5.000	539.216-
IN 57 3/02/00 577189 OB0146						1.500	540.716-	IN 57 3/02/00577190 OB0146					1.500	542.216-
IN 57 3/02/00 577192 OB0146						.914	543.130-	IN 57 3/02/00577193 OB0146					1.471	544.601-
IN 57 3/02/00 577194 OB0146						21.500	566.101-	IN 57 3/03/00577195 OB0146					.938	567.039-
IN 57 3/04/00 577197 OB0146						2.250	569.289-	IN 57 3/04/00577198 OB0146					.351	569.640-
IN 57 3/06/00 577199 OB0146						6.768	576.408-	IN 57 3/06/00577201 OB0146					.938	577.346-
IN 57 3/06/00 577202 OB0146						.469	577.815-	IN 57 3/07/00577204 OB0146					2.500	580.315-
IN 57 3/07/00 577205 OB0146						.234	580.549-	IN 57 3/07/00577207 OB0146					.375	580.924-
IN 57 3/07/00 577208 OB0146						.405	581.329-	IN 57 3/08/00577210 OB0146					6.692	588.021-
IN 57 3/08/00 577211 OB0146						.556	588.577-	IN 57 3/09/00577212 OB0146					4.000	592.577-
IN 57 3/09/00 577214 OB0146						4.000	596.577-	IN 57 3/09/00577215 OB0146					2.500	599.077-

El Dorado Chemical Co
TRANSACTION REGISTER

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PRODUCT / DESCRIPTION	TYP	WHS	DATE	REF.	USER	QUANTITY	TOTAL	TYP	WHS	DATE	REF.	USER	QUANTITY	TOTAL
IN 57 3/10/00 577216 OB0146	.126	599.203-	IN 57 3/13/00 577221 OB0146	1.876	601.079-									
IN 57 3/13/00 577221 OB0146	.797	601.876-	IN 57 3/13/00 577223 OB0146	1.876	603.752-									
IN 57 3/13/00 577224 OB0146	1.125	604.877-	IN 57 3/13/00 577225 OB0146	1.078	605.955-									
IN 57 3/13/00 577227 OB0146	3.752	609.707-	IN 57 3/13/00 577229 OB0146	.211	609.918-									
IN 57 3/13/00 577230 OB0146	1.750	611.668-	IN 57 3/13/00 577231 OB0146	.422	612.090-									
IN 57 3/13/00 577234 OB0146	1.407	613.497-	IN 57 3/14/00 577236 OB0146	.902	614.399-									
IN 57 3/14/00 577239 OB0146	.938	615.337-	IN 57 3/14/00 577240 OB0146	2.000	617.337-									
IN 57 3/14/00 577241 OB0146	1.965	619.302-	IN 57 3/14/00 577243 OB0146	2.250	621.552-									
IN 57 3/14/00 577249 OB0146	1.668	623.220-	IN 57 3/14/00 577253 OB0146	.091	623.311-									
IN 57 3/15/00 577256 OB0146	1.692	625.003-	IN 57 3/15/00 577257 OB0146	5.000	630.003-									
IN 57 3/15/00 577266 OB0146	.706	630.709-	IN 57 3/15/00 577267 OB0146	.234	630.943-									
IN 57 3/16/00 577268 OB0146	1.758	632.701-	IN 57 3/16/00 577269 OB0146	1.465	634.166-									
IN 57 3/16/00 577271 OB0146	5.000	639.166-	IN 57 3/16/00 577274 OB0146	.938	640.104-									
IN 57 3/16/00 577276 OB0146	.834	640.938-	IN 57 3/16/00 577277 OB0146	.456	641.394-									
IN 57 3/20/00 577279 OB0146	2.814	644.208-	IN 57 3/20/00 577280 OB0146	3.500	647.708-									
IN 57 3/20/00 577281 OB0146	1.195	648.903-	IN 57 3/20/00 577283 OB0146	2.507	651.410-									
IN 57 3/20/00 577284 OB0146	3.500	654.910-	IN 57 3/20/00 577286 OB0146	4.300	659.210-									
IN 57 3/21/00 577288 OB0146	.150	659.360-	IN 57 3/21/00 577289 OB0146	.253	659.613-									
IN 57 3/21/00 577290 OB0146	.406	660.019-	IN 57 3/24/00 577293 OB0146	1.055	661.074-									
IN 57 3/24/00 577294 OB0146	2.579	663.653-	IN 57 3/27/00 577297 OB0146	.469	664.122-									
IN 57 3/27/00 577298 OB0146	.938	665.060-	IN 57 3/27/00 577299 OB0146	14.000	679.060-									
IN 57 3/27/00 577300 OB0146	1.740	680.800-	IN 57 3/28/00 577301 OB0146	3.500	684.300-									
IN 57 3/28/00 577306 OB0146	4.262	688.562-	IN 57 3/28/00 577307 OB0146	.762	689.324-									
IN 57 3/29/00 577309 OB0146	.703	690.027-	IN 57 3/29/00 577309 OB0146	.762-	689.265-									
IN 57 3/29/00 577313 OB0146	.762	690.027-	IN 57 3/29/00 577314 OB0146	.870	690.897-									
IN 57 3/30/00 577316 OB0146	2.500	693.397-	IN 57 3/30/00 577317 OB0146	1.876	695.273-									
IN 57 3/31/00 577320 OB0146	1.015	696.288-	IN 57 3/31/00 577321 OB0146	.469	696.757-									
IN 57 3/31/00 577323 OB0146	.703	697.460-	IN 57 3/31/00 577324 OB0146	.812	698.272-									
IN 57 3/31/00 577327 OB0146	2.000	700.272-	IN 57 3/31/00 577328 OB0146	.543	700.815-									
IN 57 3/31/00 577329 OB0146	.797	701.612-	IN 57 4/01/00 577330 OB0146	1.000	702.612-									
IN 57 4/01/00 577332 OB0146	.760	703.372-	IN 57 4/01/00 577333 OB0146	.304	703.676-									
IN 57 4/03/00 577334 OB0146	.652	704.328-	IN 57 4/04/00 577338 OB0146	.725	705.053-									
IN 57 4/04/00 577341 OB0146	2.000	707.053-	IN 57 4/04/00 577342 OB0146	.562	707.615-									
IN 57 4/05/00 577343 OB0146	1.015	708.630-	IN 57 4/05/00 577344 OB0146	1.380	710.010-									
IN 57 4/05/00 577345 OB0146	4.221	714.231-	IN 57 4/05/00 577346 OB0146	1.758	715.989-									
IN 57 4/05/00 577350 OB0146	.562	716.551-	IN 57 4/05/00 577353 OB0146	.797	717.348-									
IN 57 4/06/00 577355 OB0146	2.006	719.354-	IN 57 4/06/00 577356 OB0146	5.000	724.354-									
IN 57 4/06/00 577358 OB0146	.870	725.224-	IN 57 4/06/00 577361 OB0146	3.824	729.048-									
IN 57 4/06/00 577362 OB0146	1.000	730.048-	IN 57 4/06/00 577364 OB0146	1.195	731.243-									
IN 57 4/06/00 577365 OB0146	.703	731.946-	IN 57 4/06/00 577366 OB0146	.870	732.816-									
IN 57 4/06/00 577367 OB0146	2.629	735.445-	IN 57 4/06/00 577368 OB0146	1.829	737.274-									
IN 57 4/06/00 577369 OB0146	.844	738.118-	IN 57 4/06/00 577370 OB0146	.469	738.587-									
IN 57 4/07/00 577371 OB0146	1.172	739.759-	IN 57 4/07/00 577372 OB0146	.717	740.476-									
IN 57 4/07/00 577376 OB0146	2.390	742.866-	IN 57 4/07/00 577377 OB0146	.182	743.048-									
IN 57 4/07/00 577378 OB0146	.250	743.298-	IN 57 4/07/00 577379 OB0146	.956	744.254-									
IN 57 4/07/00 577380 OB0146	2.390	746.644-	IN 57 4/07/00 577382 OB0146	.070	746.714-									
IN 57 4/07/00 577383 OB0146	1.897	748.611-	IN 57 4/08/00 577386 OB0146	1.504	750.115-									
IN 57 4/08/00 577387 OB0146	1.434	751.549-	IN 57 4/08/00 577388 OB0146	4.000	755.549-									
IN 57 4/08/00 577389 OB0146	1.055	756.604-	IN 57 4/08/00 577390 OB0146	.956	757.560-									
IN 57 4/08/00 577391 OB0146	1.876	759.436-	IN 57 4/08/00 577393 OB0146	5.000	764.436-									
IN 57 4/10/00 577395 OB0146	2.961	767.397-	IN 57 4/10/00 577396 OB0146	2.820	770.217-									
IN 57 4/10/00 577397 OB0146	1.334	771.551-	IN 57 4/10/00 577399 OB0146	.820	772.371-									

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IN 57 4/10/00 577401 OB0146	.836	776.207-	IN 57 4/10/00577402 OB0146	.417	776.624-									
IN 57 4/10/00 577403 OB0146	.870	777.494-	IN 57 4/10/00577404 OB0146	.500	777.994-									
IN 57 4/10/00 577405 OB0146	.691	778.685-	IN 57 4/10/00577406 OB0146	2.000	780.685-									
IN 57 4/10/00 577407 OB0146	.430	781.115-	IN 57 4/11/00577408 OB0146	.956	782.071-									
IN 57 4/11/00 577409 OB0146	.938	783.009-	IN 57 4/11/00577410 OB0146	.556	783.565-									
IN 57 4/11/00 577411 OB0146	.278	783.843-	IN 57 4/11/00577412 OB0146	3.752	787.595-									
IN 57 4/11/00 577413 OB0146	.870	788.465-	IN 57 4/11/00577414 OB0146	5.000	793.465-									
IN 57 4/11/00 577416 OB0146	1.000	794.465-	IN 57 4/11/00577417 OB0146	6.000	800.465-									
IN 57 4/11/00 577422 OB0146	.717	801.182-	IN 57 4/13/00577434 OB0146	.616	801.798-									
IN 57 4/14/00 939 OB0146	3.127-	798.671-	IN 57 4/14/00577435 OB0146	2.641	801.312-									
IN 57 4/15/00 577436 OB0146	.375	801.687-	IN 57 4/17/00577438 OB0146	.342	802.029-									
IN 57 4/17/00 577439 OB0146	1.434	803.163-	IN 57 4/17/00577440 OB0146	.870	804.333-									
IN 57 4/17/00 577442 OB0146	.938	805.271-	IN 57 4/18/00577443 OB0146	.556	805.827-									
IN 57 4/18/00 577444 OB0146	.870	806.697-	IN 57 4/18/00577445 OB0146	.703	807.400-									
IN 57 4/18/00 577448 OB0146	.870	808.270-	IN 57 4/18/00577449 OB0146	5.684	813.954-									
IN 57 4/18/00 577450 OB0146	4.259	818.213-	IN 57 4/18/00577452 OB0146	.469	818.682-									
IN 57 4/18/00 577453 OB0146	.609	819.291-	IN 57 4/19/00577455 OB0146	.703	819.994-									
IN 57 4/19/00 577457 OB0146	.500	820.494-	IN 57 4/19/00577461 OB0146	.725	821.219-									
IN 57 4/20/00 577464 OB0146	1.504	822.723-	IN 57 4/20/00577466 OB0146	6.500	829.223-									
IN 57 4/20/00 577470 OB0146	5.000	834.223-	IN 57 4/20/00577473 OB0146	.609	834.832-									
IN 57 4/20/00 577474 OB0146	.870	835.702-	IN 57 4/21/00577475 OB0146	1.600	837.302-									
IN 57 4/21/00 577476 OB0146	1.253	838.555-	IN 57 4/21/00577477 OB0146	2.500	841.055-									
IN 57 4/21/00 577479 OB0146	.351	841.406-	IN 57 4/21/00577481 OB0146	2.000	843.406-									
IN 57 4/21/00 577483 OB0146	.478	843.884-	IN 57 4/21/00577484 OB0146	5.000	848.884-									
IN 57 4/21/00 577485 OB0146	2.122	851.006-	IN 57 4/21/00577487 OB0146	2.931	853.937-									
IN 57 4/24/00 577489 OB0146	4.244	858.181-	IN 57 4/24/00577490 OB0146	2.502	860.683-									
IN 57 4/24/00 577491 OB0146	3.752	864.435-	IN 57 4/24/00577495 OB0146	7.467	871.902-									
IN 57 4/24/00 577497 OB0146	3.892	875.794-	IN 57 4/24/00577498 OB0146	1.946	877.740-									
IN 57 4/24/00 577499 OB0146	.870	878.610-	IN 57 4/24/00577500 OB0146	2.625	881.235-									
IN 57 4/24/00 577503 OB0146	3.500	884.735-	IN 57 4/24/00577504 OB0146	1.112	885.847-									
IN 57 4/24/00 577505 OB0146	.820	886.667-	IN 57 4/24/00577507 OB0146	1.200	887.867-									
IN 57 4/24/00 577508 OB0146	1.407	889.274-	IN 57 4/24/00577510 OB0146	2.931	892.205-									
IN 57 4/25/00 489 OB0146	4.244-	887.961-	IN 57 4/25/00577514 OB0146	.833	888.794-									
IN 57 4/26/00 577518 OB0146	.725	889.519-	IN 57 4/26/00577523 OB0146	.877	890.396-									
IN 57 4/26/00 577524 OB0146	10.100	900.496-	IN 57 4/26/00577525 OB0146	.500	900.996-									
IN 57 4/26/00 577526 OB0146	2.571	903.567-	IN 57 4/26/00577527 OB0146	1.000	904.567-									
IN 57 4/26/00 577528 OB0146	5.000	909.567-	IN 57 4/26/00577529 OB0146	1.253	910.820-									
IN 57 4/26/00 577530 OB0146	.399	911.219-	IN 57 4/27/00577531 OB0146	4.012	915.231-									
IN 57 4/27/00 577532 OB0146	3.000	918.231-	IN 57 4/27/00577533 OB0146	2.000	920.231-									
IN 57 4/27/00 577536 OB0146	1.253	921.484-	IN 57 4/27/00577537 OB0146	2.000	923.484-									
IN 57 4/27/00 577540 OB0146	9.500	932.984-	IN 57 4/27/00577541 OB0146	.500	933.484-									
IN 57 4/28/00 577542 OB0146	.586	934.070-	IN 57 4/28/00 533 OB0146	2.000-	932.070-									
IN 57 4/28/00 577543 OB0146	.750	932.820-	IN 57 4/28/00577545 OB0146	.870	933.690-									
IN 57 4/28/00 577546 OB0146	4.000	937.690-	IN 57 4/28/00577547 OB0146	.556	938.246-									
IN 57 4/28/00 577548 OB0146	.608	938.854-	IN 57 4/28/00577551 OB0146	1.792	940.646-									
IN 57 4/28/00 577552 OB0146	.492	941.138-	IN 57 4/28/00577553 OB0146	2.462	943.600-									
IN 57 4/28/00 577554 OB0146	12.000	955.600-	IN 57 4/29/00577556 OB0146	2.250	957.850-									
IN 57 4/29/00 577557 OB0146	1.755	959.605-	IN 57 4/29/00577558 OB0146	1.876	961.481-									
IN 57 4/29/00 577559 OB0146	1.880	963.361-	IN 57 4/29/00577560 OB0146	.324	963.685-									
IN 57 4/29/00 577561 OB0146	1.112	964.797-	IN 57 4/29/00577563 OB0146	2.000	966.797-									
IN 57 4/29/00 577565 OB0146	2.502	969.299-	IN 57 4/29/00577567 OB0146	2.043	971.342-									
IN 57 5/01/00 577568 OB0146	.611	971.953-	IN 57 5/01/00577569 OB0146	15.000	986.953-									

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PRODUCT / DESCRIPTION	TYP	WHS	DATE	REF.	USER	QUANTITY	TOTAL	TYP	WHS	DATE	REF.	USER	QUANTITY	TOTAL
IN 57 5/01/00 577572	OB0146	.870	987.823-	IN 57	5/01/00577573	OB0146	4.865	992.688-						
IN 57 5/02/00 577574	OB0146	.870	993.558-	IN 57	5/02/00577575	OB0146	.900	994.458-						
IN 57 5/03/00 577577	OB0146	.711	995.169-	IN 57	5/03/00577578	OB0146	.870	996.039-						
IN 57 5/08/00 577581	OB0146	1.055	997.094-	IN 57	5/08/00577582	OB0146	.507	997.601-						
IN 57 5/09/00 577584	OB0146	.912	998.513-	IN 57	5/09/00577585	OB0146	2.115	1000.628-						
IN 57 5/09/00 577586	OB0146	.870	1001.498-	IN 57	5/09/00577587	OB0146	.870	1002.368-						
IN 57 5/09/00 577590	OB0146	1.375	1003.743-	IN 57	5/09/00	85	OB0146	2.122-	1001.621-					
IN 57 5/09/00 577591	OB0146	1.946	1003.567-	IN 57	5/09/00	81	OB0146	2.000-	1001.567-					
IN 57 5/09/00 577592	OB0146	2.000	1003.567-	IN 57	5/09/00577594	OB0146	5.560	1009.127-						
IN 57 5/10/00 577595	OB0146	3.595	1012.722-	IN 57	5/10/00	63	OB0146	2.000-	1010.722-					
IN 57 5/10/00 577596	OB0146	14.000	1024.722-	IN 57	5/10/00577597	OB0146	12.000-	1012.722-						
IN 57 5/10/00 577599	OB0146	3.000	1015.722-	IN 57	5/10/00577601	OB0146	.684	1016.406-						
IN 57 5/10/00 577602	OB0146	4.221	1020.627-	IN 57	5/11/00577604	OB0146	2.000	1022.627-						
IN 57 5/11/00 577605	OB0146	3.000	1025.627-	IN 57	5/11/00577607	OB0146	1.500	1027.127-						
IN 57 5/11/00 577608	OB0146	.833	1027.960-	IN 57	5/11/00577609	OB0146	.246	1028.206-						
IN 57 5/11/00 577610	OB0146	.556	1028.762-	IN 57	5/11/00577611	OB0146	1.000	1029.762-						
IN 57 5/12/00 577612	OB0146	8.000	1037.762-	IN 57	5/12/00577613	OB0146	.556	1038.318-						
IN 57 5/12/00 577614	OB0146	.501	1038.819-	IN 57	5/12/00577615	OB0146	.912	1039.731-						
IN 57 5/12/00 577616	OB0146	2.000	1041.731-	IN 57	5/12/00577619	OB0146	.243	1041.974-						
IN 57 5/12/00 577621	OB0146	.547	1042.521-	IN 57	5/12/00577623	OB0146	4.012	1046.533-						
IN 57 5/12/00 577624	OB0146	2.237	1048.770-	IN 57	5/12/00577626	OB0146	1.021	1049.791-						
IN 57 5/12/00 577627	OB0146	2.000	1051.791-	IN 57	5/12/00577628	OB0146	1.000	1052.791-						
IN 57 5/12/00 577629	OB0146	2.115	1054.906-	IN 57	5/15/00577632	OB0146	1.071	1055.977-						
IN 57 5/15/00 577633	OB0146	.799	1056.776-	IN 57	5/15/00577634	OB0146	4.000	1060.776-						
IN 57 5/15/00 577637	OB0146	.848	1061.624-	IN 57	5/16/00577640	OB0146	2.000	1063.624-						
IN 57 5/16/00 577641	OB0146	4.000	1067.624-	IN 57	5/16/00577642	OB0146	.243-	1067.381-						
IN 57 5/16/00 577643	OB0146	.243	1067.624-	IN 57	5/16/00577644	OB0146	.874	1068.498-						
IN 57 5/16/00 577645	OB0146	3.400	1071.898-	IN 57	5/16/00577646	OB0146	2.262	1074.160-						
IN 57 5/16/00 577647	OB0146	1.500	1075.660-	IN 57	5/17/00577648	OB0146	.691	1076.351-						
IN 57 5/17/00 577649	OB0146	.190	1076.541-	IN 57	5/17/00577650	OB0146	.942	1077.483-						
IN 57 5/17/00 577651	OB0146	2.262	1079.745-	IN 57	5/17/00577652	OB0146	.800	1080.545-						
IN 57 5/17/00 577653	OB0146	2.000	1082.545-	IN 57	5/17/00577654	OB0146	.801	1083.346-						
IN 57 5/17/00 577657	OB0146	3.384	1086.730-	IN 57	5/17/00577658	OB0146	1.888	1088.618-						
IN 57 5/17/00 577660	OB0146	.933	1089.551-	IN 57	5/18/00577661	OB0146	.565	1090.116-						
IN 57 5/18/00 577662	OB0146	.952	1091.068-	IN 57	5/18/00577663	OB0146	3.928	1094.996-						
IN 57 5/18/00 577665	OB0146	6.811	1101.807-	IN 57	5/18/00577666	OB0146	4.500	1106.307-						
IN 57 5/18/00 577667	OB0146	2.828	1109.135-	IN 57	5/18/00577668	OB0146	1.216	1110.351-						
IN 57 5/18/00 577669	OB0146	10.000	1120.351-	IN 57	5/18/00577671	OB0146	.874	1121.225-						
IN 57 5/18/00 577672	OB0146	2.497	1123.722-	IN 57	5/18/00577673	OB0146	5.932	1129.654-						
IN 57 5/18/00 577674	OB0146	2.400	1132.054-	IN 57	5/18/00577675	OB0146	4.230	1136.284-						
IN 57 5/18/00 577677	OB0146	2.116	1138.400-	IN 57	5/18/00577678	OB0146	2.116	1140.516-						
IN 57 5/18/00 577679	OB0146	2.432	1142.948-	IN 57	5/19/00577680	OB0146	.900	1143.848-						
IN 57 5/19/00	667	OB0146	2.828-	IN 57	5/19/00577681	OB0146	2.828	1143.848-						
IN 57 5/22/00 577682	OB0146	1.825	1145.673-	IN 57	5/22/00577683	OB0146	.848	1146.521-						
IN 57 5/22/00 577684	OB0146	2.000	1148.521-	IN 57	5/22/00577686	OB0146	1.112	1149.633-						
IN 57 5/22/00 577687	OB0146	1.824	1151.457-	IN 57	5/22/00577688	OB0146	1.650	1153.107-						
IN 57 5/23/00 577689	OB0146	2.262	1155.369-	IN 57	5/23/00577694	OB0146	1.824	1157.193-						
IN 57 5/24/00 577695	OB0146	3.750	1160.943-	IN 57	5/24/00577698	OB0146	2.827	1163.770-						
IN 57 5/24/00 577699	OB0146	5.000	1168.770-	IN 57	5/25/00577700	OB0146	3.405	1172.175-						
IN 57 5/25/00 577701	OB0146	.874	1173.049-	IN 57	5/25/00577702	OB0146	.700	1173.749-						
IN 57 5/25/00 577703	OB0146	.933-	1172.816-	IN 57	5/25/00577704	OB0146	.892	1173.708-						
IN 57 5/25/00 577705	OB0146	.846	1174.554-	IN 57	5/26/00577706	OB0146	2.120	1176.674-						

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IN 57 5/26/00 577707 OB0146						3.000	1179.674-	IN 57 5/26/00577708 OB0146					2.262	1181.936-
IN 57 5/26/00 577709 OB0146						3.675	1185.611-	IN 57 5/26/00577710 OB0146					2.856	1188.467-
IN 57 5/26/00 577713 OB0146						2.262	1190.729-	IN 57 5/26/00577714 OB0146					4.230	1194.959-
IN 57 5/26/00 577715 OB0146						2.120	1197.079-	IN 57 5/26/00577716 OB0146					.838	1197.917-
IN 57 5/26/00 577717 OB0146						1.521	1199.438-	IN 57 5/26/00577719 OB0146					6.403	1205.841-
IN 57 5/29/00 577721 OB0146						.711	1206.552-	IN 57 5/29/00577722 OB0146					.711	1207.263-
IN 57 5/29/00 577723 OB0146						1.413	1208.676-	IN 57 5/29/00577724 OB0146					1.696	1210.372-
IN 57 5/29/00 577725 OB0146						2.262	1212.634-	IN 57 5/29/00577726 OB0146					3.000	1215.634-
IN 57 5/30/00 577707 OB0146						3.000-	1212.634-	IN 57 5/31/00577727 OB0146					2.827	1215.461-
IN 57 5/31/00 577728 OB0146						.500	1215.961-	IN 57 5/31/00577729 OB0146					2.262	1218.223-
IN 57 5/31/00 577730 OB0146						.874	1219.097-	IN 57 6/01/00577731 OB0146					2.028	1221.125-
IN 57 6/01/00 577732 OB0146						2.827	1223.952-	IN 57 6/01/00577733 OB0146					1.059	1225.011-
IN 57 6/01/00 577740 OB0146						3.500	1228.511-	IN 57 6/01/00577742 OB0146					1.200	1229.711-
IN 57 6/01/00 577743 OB0146						.007	1229.718-	IN 57 6/02/00577746 OB0146					.476	1230.194-
IN 57 6/02/00 577749 OB0146						2.500	1232.694-	IN 57 6/02/00577751 OB0146					1.648	1234.342-
IN 57 6/02/00 577753 OB0146						.309	1234.651-	IN 57 6/02/00577754 OB0146					1.131	1235.782-
IN 57 6/02/00 577755 OB0146						1.413	1237.195-	IN 57 6/02/00577756 OB0146					.848	1238.043-
IN 57 6/02/00 577757 OB0146						1.131	1239.174-	IN 57 6/05/00577761 OB0146					1.200	1240.374-
IN 57 6/05/00 577763 OB0146						7.917	1248.291-	IN 57 6/05/00577764 OB0146					.952	1249.243-
IN 57 6/07/00 577767 OB0146						.360	1249.603-	IN 57 6/07/00577768 OB0146					1.964	1251.567-
IN 57 6/07/00 577769 OB0146						.304	1251.871-	IN 57 6/07/00577770 OB0146					1.413	1253.284-
IN 57 6/07/00 577771 OB0146						1.800	1255.084-	IN 57 6/07/00 77715 OB0146					2.120-	1252.964-
IN 57 6/07/00 577772 OB0146						1.785	1254.749-	IN 57 6/08/00577773 OB0146					5.500	1260.249-
IN 57 6/08/00 577774 OB0146						2.262	1262.511-	IN 57 6/08/00577775 OB0146					1.500	1264.011-
IN 57 6/08/00 577777 OB0146						1.200	1265.211-	IN 57 6/08/00577778 OB0146					1.946	1267.157-
IN 57 6/08/00 577781 OB0146						1.200	1268.357-	IN 57 6/08/00577782 OB0146					.706	1269.063-
IN 57 6/08/00 577783 OB0146						2.544	1271.607-	IN 57 6/08/00577784 OB0146					2.827	1274.434-
IN 57 6/09/00 577785 OB0146						.437	1274.871-	IN 57 6/09/00577787 OB0146					.350	1275.221-
IN 57 6/09/00 577788 OB0146						1.500	1276.721-	IN 57 6/09/00577791 OB0146					.565	1277.286-
IN 57 6/09/00 577796 OB0146						.809	1278.095-	IN 57 6/09/00577797 OB0146					3.110	1281.205-
IN 57 6/12/00 577798 OB0146						.900	1282.105-	IN 57 6/12/00577800 OB0146					1.200	1283.305-
IN 57 6/13/00 577808 OB0146						.848	1284.153-	IN 57 6/14/00577809 OB0146					1.673	1285.826-
IN 57 6/14/00 577811 OB0146						3.549	1289.375-	IN 57 6/14/00577815 OB0146					1.131	1290.506-
IN 57 6/14/00 577816 OB0146						2.028	1292.534-	IN 57 6/14/00577817 OB0146					2.538	1295.072-
IN 57 6/14/00 577818 OB0146						1.785	1296.857-	IN 57 6/14/00577819 OB0146					1.200	1298.057-
IN 57 6/14/00 577820 OB0146						3.500	1301.557-	IN 57 6/15/00577821 OB0146					.424	1301.981-
IN 57 6/15/00 577822 OB0146						4.524	1306.505-	IN 57 6/15/00577824 OB0146					.848	1307.353-
IN 57 6/21/00 7763 OB0146						7.917-	1299.436-	IN 57 6/21/00577825 OB0146					7.917	1307.353-
IN 57 6/22/00 543 OB0146						.750-	1306.603-	IN 57 6/22/00577826 OB0146					.750	1307.353-
IN 57 6/22/00 577827 OB0146						1.200	1308.553-	IN 57 6/22/00577828 OB0146					1.200	1309.753-
IN 57 6/22/00 577830 OB0146						2.028	1311.781-	IN 57 6/22/00577831 OB0146					.507	1312.288-
IN 57 6/22/00 577832 OB0146						.547	1312.835-	IN 57 6/23/00577834 OB0146					.952	1313.787-
IN 57 6/23/00 577835 OB0146						1.200	1314.987-	IN 57 6/27/00577840 OB0146					.762-	1314.225-
IN 57 6/27/00 577841 OB0146						.213-	1314.012-	IN 57 6/28/00577842 OB0146					.824	1314.836-
IN 57 6/28/00 577843 OB0146						2.000	1316.836-	IN 57 6/28/00577844 OB0146					1.000	1317.836-
IN 57 6/28/00 577845 OB0146						.821	1318.657-	IN 57 6/28/00577848 OB0146					1.250	1319.907-
IN 57 6/28/00 577846 OB0146						.705	1320.612-	IN 57 6/28/00577849 OB0146					1.125	1321.737-
IN 57 6/28/00 577850 OB0146						.500	1322.237-	IN 57 6/28/00577851 OB0146					4.000	1326.237-
IN 57 6/28/00 577852 OB0146						4.000	1330.237-	IN 57 6/28/00577853 OB0146					1.200	1331.437-
IN 57 6/28/00 577854 OB0146						1.200	1332.637-	IN 57 6/28/00577855 OB0146					4.000	1336.637-
IN 57 6/28/00 577856 OB0146						2.500	1339.137-	IN 57 6/28/00577858 OB0146					.178-	1338.959-
IN 57 6/28/00 577859 OB0146						6.081	1345.040-	IN 57 6/28/00577860 OB0146					.705	1345.745-

IN0070 252

[REDACTED]

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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PRODUCT / DESCRIPTION														
TYP	WHS	DATE	REF.	USER	QUANTITY	TOTAL	TYP	WHS	DATE	REF.	USER	QUANTITY	TOTAL	
IN	57	6/28/00	577861	OB0146	.705	1346.450-	IN	57	6/28/00	00577862	OB0146	1.094	1347.544-	
IN	57	6/29/00	577865	OB0146	2.000	1349.544-	IN	57	6/29/00	846	OB0146	.705-	1348.839-	
IN	57	6/29/00	577866	OB0146	1.200	1350.039-	IN	57	6/29/00	00577867	OB0146	.500	1350.539-	
IN	57	6/30/00	577871	OB0146	1.428	1351.967-	IN	57	6/30/00	00577873	OB0146	2.053	1354.020-	
IN	57	7/05/00	577874	OB0146	.600	1354.620-	IN	57	7/05/00	00577875	OB0146	1.645	1356.265-	
IN	57	7/05/00	577876	OB0146	3.648	1359.913-	IN	57	7/06/00	00577877	OB0146	1.000	1360.913-	
IN	57	7/06/00	577878	OB0146	.565	1361.478-	IN	57	7/06/00	00577882	OB0146	.125	1361.603-	
IN	57	7/06/00	577883	OB0146	2.550	1364.153-	IN	57	7/07/00	00577889	OB0146	1.200	1365.353-	
IN	57	7/10/00	577892	OB0146	1.200	1366.553-	IN	57	7/11/00	00577894	OB0146	1.000	1367.553-	
IN	57	7/12/00	577900	OB0146	.486	1368.039-	IN	57	7/12/00	00577901	OB0146	.822	1368.861-	
IN	57	7/14/00	577905	OB0146	.705	1369.566-	IN	57	7/17/00	00577906	OB0146	1.200	1370.766-	
IN	57	7/18/00	577907	OB0146	1.000	1371.766-	IN	57	7/18/00	00577908	OB0146	.705	1372.471-	
IN	57	7/19/00	577910	OB0146	2.544	1375.015-	IN	57	7/19/00	00577911	OB0146	1.200	1376.215-	
IN	57	7/21/00	577914	OB0146	2.500	1378.715-	IN	57	7/21/00	00577915	OB0146	.205	1378.920-	
IN	57	7/25/00	577916	OB0146	.705	1379.625-	IN	57	7/25/00	00577917	OB0146	1.000	1380.625-	
IN	57	7/25/00	577921	OB0146	.657	1381.282-	IN	57	7/28/00	00577925	OB0146	2.961	1384.243-	
IN	57	7/31/00	577927	OB0146	4.000	1388.243-	IN	57	7/31/00	00577931	OB0146	1.000	1389.243-	
IN	57	7/31/00	577932	OB0146	1.000	1390.243-	IN	57	8/01/00	00577934	OB0146	1.240	1391.483-	
IN	57	8/01/00	577937	OB0146	1.696	1393.179-	IN	57	8/03/00	00577939	OB0146	2.028	1395.207-	
IN	57	8/03/00	577940	OB0146	2.028	1397.235-	IN	57	8/08/00	00577946	OB0146	.650	1397.885-	
IN	57	8/08/00	577947	OB0146	.822	1398.707-	IN	57	8/09/00	00577948	OB0146	.587	1399.294-	
IN	57	8/10/00	577949	OB0146	1.521	1400.815-	IN	57	8/10/00	00577950	OB0146	1.000	1401.815-	
IN	57	8/10/00	577952	OB0146	2.432	1404.247-	IN	57	8/14/00	00577953	OB0146	1.000	1405.247-	
IN	57	8/14/00	577954	OB0146	.750	1405.997-	IN	57	8/14/00	103	OB0146	1.450-	1404.547-	
IN	57	8/16/00	824	OB0146	.848-	1403.699-	IN	57	8/17/00	00577959	OB0146	.822	1404.521-	
IN	57	8/21/00	577965	OB0146	1.000	1405.521-	IN	57	8/21/00	00577966	OB0146	1.000	1406.521-	
IN	57	8/24/00	577970	OB0146	1.131	1407.652-	IN	57	8/28/00	00577971	OB0146	1.000	1408.652-	
IN	57	8/28/00	577972	OB0146	1.000	1409.652-	IN	57	9/07/00	00577978	OB0146	1.000	1410.652-	
IN	57	9/07/00	577979	OB0146	.360	1411.012-	IN	57	9/08/00	00577982	OB0146	.700	1412.712-	
IN	57	9/11/00	577984	OB0146	1.000	1413.712-	IN	57	9/14/00	00577986	OB0146	1.000	1414.712-	
IN	57	9/15/00	577987	OB0146	.250	1414.962-	IN	57	9/18/00	00577988	OB0146	1.000	1415.962-	
IN	57	9/18/00	577989	OB0146	1.000	1416.962-	IN	57	9/20/00	00577990	OB0146	.587	1417.549-	
IN	57	9/20/00	577991	OB0146	.821	1418.370-	IN	57	9/21/00	00577997	OB0146	.600	1418.970-	
IN	57	9/21/00	577999	OB0146	140.000	1558.970-	IN	57	9/21/00	00578001	OB0146	22.275	1581.245-	
IN	57	9/22/00	578003	OB0146	2.000	1583.245-	IN	57	9/22/00	00578005	OB0146	.896	1584.141-	
IN	57	9/22/00	578008	OB0146	2.262	1586.403-	IN	57	9/25/00	00578011	OB0146	1.000	1587.403-	
IN	57	9/25/00	578012	OB0146	1.000	1588.403-	IN	57	9/25/00	00578013	OB0146	1.190	1589.593-	
IN	57	9/26/00	578014	OB0146	.547	1590.140-	IN	57	9/27/00	00578018	OB0146	.500	1590.640-	
IN	57	9/27/00	578019	OB0146	2.351	1592.991-	IN	57	9/29/00	00578025	OB0146	.250	1593.241-	
IN	57	9/29/00	578027	OB0146	2.500	1595.741-	IN	57	10/06/00	00578030	OB0146	1.011	1596.752-	
IN	57	10/06/00	578031	OB0146	.333	1597.085-	IN	57	10/06/00	00578033	OB0146	.108	1597.193-	

VALID TRANSACTIONS BEG BAL ISSUES RECEIPTS ADJSTS

PRODUCT TOTALS 702 .000 1597.193 .000 .000

VALID TRANSACTIONS BEG BAL ISSUES RECEIPTS ADJSTS

GRAND TOTALS 702 .000 1597.193 .000 .000

IN0070 252

[REDACTED]

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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SUMMARY PAGE

REPORT OPTIONS

PRODUCT NUMBER FROM 52000
PRODUCT NUMBER TO 52000
LOT I.D.

WAREHOUSE I.D.
LOCATION WITHIN WAREHOUSE 57

TRANSACTION CODE IN

TRANSACTION DATE - FROM 10/01/99

TRANSACTION DATE - TO 10/11/00

REPORT TYPE LOW

*** END OF SUMMARY ***

*Transfers to
EDC location*
#2

IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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PRODUCT / DESCRIPTION TYP WHS DATE REF.	USER	QUANTITY	TOTAL	TYP WHS DATE REF.	USER	QUANTITY	TOTAL
52000 E-2 AMMONIUM NITRATE FR 57 10/07/99 579910 DUBLIN FR 57 10/29/99 569966 WAX FR 57 4/12/00 ITASCA		CLASS 1 23.940- 14.644- 6.223-	U/M NT 23.940- 53.228- 74.095-	FR 57 10/29/99 FR 57 10/29/99 569966 FR 57 4/12/00	ITASCA WAX ITASCA	14.644- 14.644- 3.111-	38.584- 67.872- 77.206-
VALID TRANSACTIONS		BEG BAL	ISSUES	RECEIPTS	ADJSTS		
PRODUCT TOTALS	6	.000	.000	.000	77.206-		
VALID TRANSACTIONS		BEG BAL	ISSUES	RECEIPTS	ADJSTS		
GRAND TOTALS	6	.000	.000	.000	77.206-		

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 12-11-2009 BY 60324 uc baw/sab/lsg

IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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SUMMARY PAGE

REPORT OPTIONS

PRODUCT NUMBER FROM 52000
PRODUCT NUMBER TO 52000
LOT I.D.

WAREHOUSE I.D.
LOCATION WITHIN WAREHOUSE 57

TRANSACTION CODE FR

TRANSACTION DATE - FROM 10/01/99

TRANSACTION DATE - TO 10/11/00

REPORT TYPE LOW

*** END OF SUMMARY ***

IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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#3

PRODUCT / DESCRIPTION	TYP	WHS	DATE	REF.	USER	QUANTITY	TOTAL	TYP	WHS	DATE	REF.	USER	QUANTITY	TOTAL
52000 E-2 AMMONIUM NITRATE														
PA 76 10/05/99 DUBLIN	35.000-	U/M NT	PA 51 10/30/99 51268			35.000-	PA 51 10/30/99 51268	1.500-	36.500-				36.500-	
PA 51 11/30/99 51272	2.440-		PA 55 11/30/99 65553	CORS		38.940-	PA 55 11/30/99 65553	1.500-	40.440-				40.440-	
PA 56 11/30/99 ITASCA	2.000-		PA 51 12/31/99 51281			42.440-	PA 51 12/31/99 51281	1.470-	43.910-				43.910-	
PA 51 1/31/00 51282	6.120-		PA 51 2/29/00 51282			50.030-	PA 51 2/29/00 51282	1.880-	51.910-				51.910-	
PA 51 3/31/00 51289	3.660-		PA 55 3/31/00 65514	CORS		55.570-	PA 55 3/31/00 65514	3.000-	58.570-				58.570-	
PA 76 4/14/00 DUBLIN	5.000-		PA 44 4/20/00 PORT			63.570-	PA 44 4/20/00 PORT	13.029-	76.599-				76.599-	
PA 55 4/24/00 65519 CORS	2.430-		PA 77 4/28/00 ATHENS			79.029-	PA 77 4/28/00 ATHENS	15.794	63.235-				63.235-	
PA 51 4/29/00 51293	5.010-		PA 44 5/16/00 PORT			68.245-	PA 44 5/16/00 PORT	475.739	407.494				407.494	
PA 77 5/17/00 ATHENS	12.000-		PA 77 5/17/00 ATHENS			395.494	PA 77 5/17/00 ATHENS	12.000	407.494				407.494	
PA 77 5/17/00 ATHENS	12.000-		PA 77 5/24/00 ATHENS			419.494	PA 77 5/24/00 ATHENS	10.000	429.494				429.494	
PA 49 5/31/00 51297	27.570-		PA 50 5/31/00 53100			401.924	PA 50 5/31/00 53100	2.332-	399.592				399.592	
PA 51 5/31/00 51297	3.770-		PA 55 5/31/00 65525 CORS			395.822	PA 55 5/31/00 65525 CORS	3.000-	392.822				392.822	
PA 76 5/31/00 DUBLIN	7.000-		PA 53 6/08/00 65324			385.822	PA 53 6/08/00 65324	10.880	396.702				396.702	
PA 49 6/16/00 DUBLIN	1.741-		PA 76 6/27/00 DUBLIN			394.961	PA 76 6/27/00 DUBLIN	10.000-	384.961				384.961	
PA 57 6/28/00 657696	143.380-		PA 77 6/28/00 ATHENS			241.581	PA 77 6/28/00 ATHENS	30.492-	211.089				211.089	
PA 45 6/30/00 630001	40.000-		PA 50 7/20/00 29			171.089	PA 50 7/20/00 29	26.290-	144.799				144.799	
PA 53 7/20/00 653263	87.520-		PA 54 7/20/00 720002			57.279	PA 54 7/20/00 720002	36.500-	20.779				20.779	
PA 75 7/20/00	26.620-		PA 47 7/27/00 470701			5.841-	PA 47 7/27/00 470701	28.220-	34.061-				34.061-	
PA 51 7/31/00 51303	1.030-		PA 56 8/01/00 73100	ITASCA		35.091-	PA 56 8/01/00 73100	7.427-	42.518-				42.518-	
PA 76 8/10/00 DUBLIN	6.500-		PA 50 8/31/00 ITASCA			49.018-	PA 50 8/31/00 ITASCA	.169-	49.187-				49.187-	
PA 51 9/30/00 51304	3.070-		PA 56 10/04/00 56262 ITASCA			52.257-	PA 56 10/04/00 56262 ITASCA	98.355	46.098				46.098	
PA 56 10/04/00 56262 ITASCA	98.355-		PA 56 10/04/00 56262 ITASCA			52.257-	PA 56 10/04/00 56262 ITASCA	98.355	150.612-				150.612-	

VALID TRANSACTIONS BEG BAL ISSUES RECEIPTS ADJSTS

PRODUCT TOTALS 44 .000 .000 .000 150.612-

VALID TRANSACTIONS BEG BAL ISSUES RECEIPTS ADJSTS

GRAND TOTALS 44 .000 .000 .000 150.612-

Physical Adjustment

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 12-11-2009 BY 60324 uc baw/sab/lsg

IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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SUMMARY PAGE

REPORT OPTIONS

PRODUCT NUMBER FROM 52000
PRODUCT NUMBER TO 52000
LOT I.D.

WAREHOUSE I.D.
LOCATION WITHIN WAREHOUSE

TRANSACTION CODE PA
TRANSACTION DATE - FROM 10/01/99
TRANSACTION DATE - TO 10/11/00
REPORT TYPE LOW

*** END OF SUMMARY ***

IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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PRODUCT / DESCRIPTION TYP WHS DATE REF.	USER	QUANTITY	TOTAL	TYP WHS DATE REF.	USER	QUANTITY	TOTAL
52000 E-2 AMMONIUM-NITRATE AJ 54 10/04/99 104992		.911	CLASS 1 U/M NT .911	AJ 54 11/04/99114991		.500-	.411
AJ 51 11/09/99 51271		4.650-	4.239-	AJ 76 11/10/99	DUBLIN	35.000-	39.239-
AJ 76 11/10/99 DUBLIN		35.000-	74.239-	AJ 46 3/30/00462031	NEW	.607-	74.846-
AJ 77 5/16/00 ATHENS		12.000	62.846-	AJ 77 5/17/00	ATHENS	12.000	50.846-
AJ 77 5/17/00 ATHENS		12.000-	62.846-	AJ 77 5/17/00	ATHENS	12.000-	74.846-
AJ 52 7/05/00 169 ANNONA		21.010	53.836-	AJ 52 9/25/00	189 ANNONA	.325	53.511-
VALID TRANSACTIONS		BEG BAL	ISSUES	RECEIPTS	ADJSTS		
PRODUCT TOTALS	12	.000	.000	.000	53.511-		
VALID TRANSACTIONS		BEG BAL	ISSUES	RECEIPTS	ADJSTS		
GRAND TOTALS	12	.000	.000	.000	53.511-		

#4
Adjustments

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 12-11-2009 BY 60324 uc baw/sab/lsg

IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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SUMMARY PAGE

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REPORT OPTIONS

PRODUCT NUMBER FROM 52000
PRODUCT NUMBER TO 52000
LOT I.D.

WAREHOUSE I.D.
LOCATION WITHIN WAREHOUSE

TRANSACTION CODE AJ
TRANSACTION DATE - FROM 10/01/99
TRANSACTION DATE - TO 10/11/00
REPORT TYPE LOW

*** END OF SUMMARY ***

IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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from El Dorado
to Nauhachic
b6 b7C
#5

PRODUCT / DESCRIPTION TYP WHS DATE REF.	USER	QUANTITY	TOTAL	TYP WHS DATE REF.	USER	QUANTITY	TOTAL
52000 E-2 AMMONIUM NITRATE		CLASS 1	U/M NT				
RP 57 10/07/99 657718 WAX		23.940	23.940	RP 57 10/29/99657734 WAX		23.830	47.770
RP 57 11/16/99 657747 WAX		24.050	71.820	RP 57 11/16/99657746 WAX		24.080	95.900
RP 57 11/18/99 657753 WAX		24.770	120.670	RP 57 11/18/99657751 WAX		24.030	144.700
RP 57 11/19/99 657754 WAX		25.150	169.850	RP 57 11/24/99657760 WAX		23.950	193.800
RP 57 11/30/99 657763 WAX		24.800	218.600	RP 57 12/02/99657765 WAX		25.070	243.670
RP 57 1/07/00 657767 WAX		23.980	267.650	RP 57 1/20/00657773 WAX		24.870	292.520
RP 57 1/20/00 657774 WAX		24.820	317.340	RP 57 1/20/00657775 WAX		24.670	342.010
RP 57 1/21/00 657776 WAX		24.730	366.740	RP 57 1/24/00657778 WAX		24.280	391.020
RP 57 2/04/00 657777 WAX		24.940	415.960	RP 57 2/07/00657779 WAX		25.290	441.250
RP 57 3/02/00 657780 WAX		24.200	465.450	RP 57 3/09/00657795 WAX		26.700	492.150
RP 57 3/10/00 657796 WAX		26.890	519.040	RP 57 3/15/00657800 WAX		25.060	544.100
RP 57 3/15/00 657797 WAX		24.210	568.310	RP 57 3/16/00657801 WAX		26.340	594.650
RP 57 3/20/00 657798 WAX		25.320	619.970	RP 57 3/20/00657803 WAX		25.170	645.140
RP 57 3/20/00 657802 WAX		24.890	670.030	RP 57 3/23/00657806 WAX		24.730	694.760
RP 57 3/23/00 657807 WAX		24.660	719.420	RP 57 3/23/00657804 WAX		25.350	744.770
RP 57 3/23/00 657805 WAX		24.810	769.580	RP 57 3/24/00657809 WAX		25.010	794.590
RP 57 3/24/00 657808 WAX		25.130	819.720	RP 57 4/04/00657799 WAX		25.470	845.190
RP 57 4/06/00 657835 WAX		25.060	870.250	RP 57 4/07/00657833 WAX		24.970	895.220
RP 57 4/17/00 657842 WAX		24.590	919.810	RP 57 4/18/00657832 WAX		25.520	945.330
RP 57 5/12/00 657859 WAX		24.910	970.240	RP 57 5/12/00657858 WAX		25.120	995.360
RP 57 5/24/00 657872 WAX		24.880	1020.240	RP 57 5/24/00657871 WAX		25.090	1045.330
RP 57 5/26/00 657873 WAX		25.630	1070.960	RP 57 5/26/00657874 WAX		24.890	1095.850
RP 57 6/07/00 657878 WAX		25.370	1121.220	RP 57 6/09/00657883 WAX		25.170	1146.390
RP 57 6/22/00 657888 WAX		24.980	1171.370	RP 57 6/22/00657890 WAX		24.510	1195.880
RP 57 7/05/00 657895 WAX		25.050	1220.930	RP 57 7/05/00657889 WAX		24.950	1245.880
RP 57 7/05/00 657891 WAX		24.960	1270.840	RP 57 7/06/00657894 WAX		24.730	1295.570
RP 57 7/06/00 657897 WAX		25.090	1320.660	RP 57 7/25/00657902 WAX		24.930	1345.590
RP 57 7/25/00 657901 WAX		25.410	1371.000	RP 57 7/25/00657903 WAX		24.810	1395.810
RP 57 7/25/00 657903 WAX		24.810-	1371.000	RP 57 7/31/00657904 WAX		25.240	1396.240
RP 57 7/31/00 657905 WAX		24.790	1421.030	RP 57 7/31/00657907 WAX		24.170	1445.200
RP 57 7/31/00 657908 WAX		24.290	1469.490	RP 57 8/09/00657909 WAX		25.020	1494.510
RP 57 8/09/00 657911 WAX		25.420	1519.930	RP 57 8/09/00657910 WAX		25.120	1545.050
RP 57 8/18/00 657912 WAX		24.530	1569.580	RP 57 8/18/00657913 WAX		24.450	1594.030
RP 57 9/07/00 657920 WAX		25.090	1619.120				

VALID TRANSACTIONS	BEG BAL	ISSUES	RECEIPTS	ADJSTS
PRODUCT TOTALS	67	.000	.000	1619.120
GRAND TOTALS	67	.000	.000	1619.120

#5

QUANTITY
SHIPPEDTotal
ACCUMULATION

IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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SUMMARY PAGE

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REPORT OPTIONS

PRODUCT NUMBER FROM 52000
PRODUCT NUMBER TO 52000
LOT I.D.

WAREHOUSE I.D.
LOCATION WITHIN WAREHOUSE 57

TRANSACTION CODE RP

TRANSACTION DATE - FROM 10/01/99

TRANSACTION DATE - TO 10/11/00

REPORT TYPE LOW

*** END OF SUMMARY ***

IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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Transfer Rec'd
from FDC location

#6

PRODUCT / DESCRIPTION TYP WHS DATE REF.	USER	QUANTITY	TOTAL	TYP WHS DATE REF.	USER	QUANTITY	TOTAL
52000 E-2 AMMONIUM NITRATE		CLASS 1	U/M NT				
TO 57 10/05/99 677065 WAX		25.000	25.000	TO 57 10/07/99 99559911 WAX		25.000	50.000
TO 57 10/07/99 559912 WAX		24.000	74.000	TO 57 10/18/99677065 WAX		.090	74.090
TO 57 10/27/99 569966 WAX		14.640	88.730	TO 57 10/29/99569966 WAX		7.322	96.052
TO 57 10/29/99 ITASCA		29.292	125.344	TO 57 5/30/00560076 WAX		15.908	141.252
TO 57 5/30/00 560076 WAX		15.908-	125.344	TO 57 5/30/00560076 WAX		7.954	133.298
TO 57 7/06/00 664741 WAX		27.230	160.528				

VALID TRANSACTIONS BEG BAL ISSUES RECEIPTS ADJSTS

PRODUCT TOTALS 11 .000 .000 .000 160.528

VALID TRANSACTIONS BEG BAL ISSUES RECEIPTS ADJSTS

GRAND TOTALS 11 .000 .000 .000 160.528

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IN0070 252

[REDACTED]

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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SUMMARY PAGE

REPORT OPTIONS

PRODUCT NUMBER FROM 52000
PRODUCT NUMBER TO 52000
LOT I.D.
WAREHOUSE I.D.
LOCATION WITHIN WAREHOUSE 57
TRANSACTION CODE TO
TRANSACTION DATE - FROM 10/01/99
TRANSACTION DATE - TO 10/11/00
REPORT TYPE LOW

*** END OF SUMMARY ***

IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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Adjustments
Report
Missing

PRODUCT / DESCRIPTION TYP WHS DATE REF.	USER	QUANTITY	TOTAL	TYP WHS DATE REF.	USER	QUANTITY	TOTAL
52000 E-2 AMMONIUM NITRATE PA 57 6/28/00 657696		CLASS 1 143.380-	U/M NT 143.380-				
VALID TRANSACTIONS		BEG BAL	ISSUES	RECEIPTS	ADJSTS		
PRODUCT TOTALS	1	.000	.000	.000	143.380-		
VALID TRANSACTIONS		BEG BAL	ISSUES	RECEIPTS	ADJSTS		
GRAND TOTALS	1	.000	.000	.000	143.380-		

#7

ALL INFORMATION CONTAINED
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IN0070 252

ROCK04A

El Dorado Chemical Co
TRANSACTION REGISTER

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SUMMARY PAGE

REPORT OPTIONS

PRODUCT NUMBER FROM 52000
PRODUCT NUMBER TO 52000
LOT I.D.

WAREHOUSE I.D.
LOCATION WITHIN WAREHOUSE 57

TRANSACTION CODE PA

TRANSACTION DATE - FROM 10/01/99

TRANSACTION DATE - TO 10/11/00

REPORT TYPE LOW

*** END OF SUMMARY ***

OB9022A 252

ROCK04A

El Dorado Chemical Co
INVOICED ORDERS REPORT BY BRANCH/PRODUCT/CUSTOMER
10/01/99 - 10/11/00

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#8

BRANCH 57

PRODUCT NUMBER	PRODUCT DESC	CUST NUMBER	CUST NAME	ORDER NUMBER	ACTUAL SHIP DATE	U/M	QUANTITY SHIPPED	UNIT PRICE	EXTENDED PRICE
52000	E-2 AMMONIUM NITRATE	15625	[REDACTED]	577401	04/10	NT	3.836	185.01825	709.73
			CUSTOMER	015625	TOTAL		3.836		709.73
52000	E-2 AMMONIUM NITRATE	17510	[REDACTED]	577383	04/07	NT	1.897	185.00264	350.95
			CUSTOMER	017510	TOTAL		1.897		350.95
52000	E-2 AMMONIUM NITRATE	20150	[REDACTED]	577667	05/18	NT	2.828	175.00000	494.90
52000	E-2 AMMONIUM NITRATE	20150	[REDACTED]	667	05/19	NT	2.828-	175.00000	494.90-
52000	E-2 AMMONIUM NITRATE	20150	[REDACTED]	577681	05/19	NT	2.828	175.00000	494.90
			CUSTOMER	020150	TOTAL		2.828		494.90
52000	E-2 AMMONIUM NITRATE	24525	[REDACTED]	577042	12/30	NT	1.500	159.00000	238.50
52000	E-2 AMMONIUM NITRATE	24525	[REDACTED]	577048	01/07	NT	4.000	159.00000	636.00
			CUSTOMER	024525	TOTAL		5.500		874.50
52000	E-2 AMMONIUM NITRATE	27315	[REDACTED]	577317	03/30	NT	1.876	185.00000	347.06
52000	E-2 AMMONIUM NITRATE	27315	[REDACTED]	577411	04/11	NT	.278	185.00000	51.43
52000	E-2 AMMONIUM NITRATE	27315	[REDACTED]	577713	05/26	NT	2.262	175.00000	395.85
52000	E-2 AMMONIUM NITRATE	27315	[REDACTED]	577754	06/02	NT	1.131	175.00442	197.93
52000	E-2 AMMONIUM NITRATE	27315	[REDACTED]	578008	09/22	NT	2.262	175.00000	395.85
			CUSTOMER	027315	TOTAL		7.809		1,388.12
52000	E-2 AMMONIUM NITRATE	[REDACTED]	[REDACTED]	10/18	NT		4.513	153.15755	691.20
		CUSTOMER	[REDACTED]	TOTAL			4.513		691.20
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	6782	10/04	NT	.634-	159.13249	100.89-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576798	10/04	NT	.634	159.13249	100.89
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576805	10/05	NT	.750	159.00000	119.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576809	10/05	NT	.253	159.48617	40.35
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576829	10/12	NT	.469	158.20896	74.20
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	6770	10/18	NT	.446-	156.99552	70.02-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576848	10/18	NT	.203	175.56650	35.64
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576858	10/21	NT	.324	159.38272	51.64
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576867	10/23	NT	.148	164.86487	24.40
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576876	10/27	NT	.812	159.00246	129.11
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576895	10/29	NT	.812	159.00246	129.11
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576907	11/01	NT	2.820	154.93972	436.93
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	895	11/01	NT	.812-	159.00246	129.11-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576916	11/03	NT	1.218	158.99836	193.66
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576917	11/03	NT	1.218	149.81938	182.48
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576919	11/03	NT	1.314	172.64840	226.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	657	11/03	NT	4.182-	163.42898	683.46-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576923	11/03	NT	1.568	113.99872	178.75
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576924	11/04	NT	1.250	159.00000	198.75
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576925	11/04	NT	1.250	159.00000	198.75
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576930	11/04	NT	1.218-	158.99836	193.66-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576931	11/04	NT	.892	156.99552	140.04
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	924	11/05	NT	1.250-	159.00000	198.75-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576934	11/05	NT	4.000	159.00000	636.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576938	11/05	NT	.750	159.00000	119.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576939	11/05	NT	3.127	159.02462	497.27

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El Dorado Chemical Co
INVOICED ORDERS REPORT BY BRANCH/PRODUCT/CUSTOMER
10/01/99 - 10/11/00

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BRANCH 57

PRODUCT NUMBER	PRODUCT DESC	CUST NUMBER	CUST NAME	ORDER NUMBER	ACTUAL SHIP DATE	U/M	QUANTITY SHIPPED	UNIT PRICE	EXTENDED PRICE
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576945	11/06	NT	.203	159.01478	32.28
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576948	11/08	NT	2.856	151.23950	431.94
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576952	11/08	NT	.913	159.09091	145.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576952	11/09	NT	.913-	159.09091	145.25-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576957	11/09	NT	.456	159.25439	72.62
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576966	11/11	NT	.556	158.99281	88.40
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576974	11/15	NT	1.605	159.00312	255.20
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576979	11/16	NT	1.218	158.99836	193.66
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576983	11/18	NT	1.000	159.00000	159.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576984	11/18	NT	.789	159.15082	125.57
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576987	11/18	NT	2.856-	151.23950	431.94-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576987	11/18	NT	2.856	151.23950	431.94
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576990	11/19	NT	1.278	159.10016	203.33
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576993	11/19	NT	.166	159.75904	26.52
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	576996	11/20	NT	1.668	158.99880	265.21
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577000	11/22	NT	2.500	159.00000	397.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577001	11/22	NT	1.000	159.00000	159.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577003	11/22	NT	.208	159.37500	33.15
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577007	11/22	NT	5.750	159.00000	914.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577009	11/22	NT	.478	158.99582	318.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577013	11/24	NT	1.000	159.00000	159.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577026	12/01	NT	.175	159.42857	27.90
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577027	12/01	NT	1.500	159.00000	238.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577028	12/02	NT	2.000	159.00000	318.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577029	12/02	NT	2.000	159.00000	318.00-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577029	12/02	NT	1.500-	159.00000	238.50-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577034	12/06	NT	2.000	159.00000	318.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577044	01/04	NT	2.000	159.00000	318.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577053	01/10	NT	6.768	149.70006	1,013.17
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577054	01/11	NT	2.500	159.00000	397.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577056	01/17	NT	2.000	159.00000	318.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577057	01/18	NT	.175-	159.42857	27.90-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577066	01/18	NT	2.850	159.00000	453.15
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577068	01/19	NT	2.000	159.00000	318.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577071	01/21	NT	2.000	159.00000	318.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577073	01/24	NT	2.000	159.00000	318.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577080	01/25	NT	6.218	149.70248	930.85
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577083	01/26	NT	2.000-	159.00000	318.00-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577084	01/26	NT	1.000	159.00000	159.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577087	01/31	NT	2.000	159.00000	318.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577101	02/03	NT	1.250	159.00000	198.75
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577104	02/07	NT	.752	159.05585	119.61
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577104	02/10	NT	1.500-	159.00000	238.50-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577111	02/11	NT	2.500	159.00000	397.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577115	02/12	NT	.846	158.99527	134.51
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577117	02/14	NT	10.575	153.00047	1,617.98
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577121	02/16	NT	1.150	159.00000	182.85
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577122	02/16	NT	1.692	175.00000	296.10
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577123	02/16	NT	1.015	175.00493	177.63
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577127	02/17	NT	.846	175.00000	148.05

El Dorado Chemical Co
INVOICED ORDERS REPORT BY BRANCH/PRODUCT/CUSTOMER
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BRANCH 57

PRODUCT NUMBER	PRODUCT DESC	CUST NUMBER	CUST NAME	ORDER NUMBER	ACTUAL SHIP DATE	U/M	QUANTITY SHIPPED	UNIT PRICE	EXTENDED PRICE
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577131	02/18	NT	2.224	175.00000	389.20
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577134	02/19	NT	2.224	175.00000	389.20
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577135	02/19	NT	.771	175.17510	135.06
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577136	02/19	NT	2.439	175.01025	426.85
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577144	02/22	NT	.912	175.00000	159.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577146	02/22	NT	.456	175.00000	79.80
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577148	02/22	NT	1.500	175.00000	262.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577167	02/29	NT	.339	175.07375	59.35
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577177	03/01	NT	1.112	175.00000	194.60
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577178	03/01	NT	.187	174.54546	32.64
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577179	03/01	NT	.834	175.00000	145.95
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577183	03/01	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577184	03/01	NT	.611	175.17185	107.03
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577188	03/02	NT	5.000	175.00000	875.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577189	03/02	NT	1.500	175.00000	262.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577190	03/02	NT	1.500	175.00000	262.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577192	03/02	NT	.914	174.10285	159.13
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577193	03/02	NT	1.471	175.03059	257.47
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577194	03/02	NT	21.500	175.00000	3,762.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577195	03/03	NT	.938	173.99787	163.21
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577197	03/04	NT	2.250	175.00000	393.75
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577198	03/04	NT	.351	174.35897	61.20
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577201	03/06	NT	.938	173.99787	163.21
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577202	03/06	NT	.469	174.00853	81.61
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577204	03/07	NT	2.500	175.00000	437.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577205	03/07	NT	.234	174.35897	40.80
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577207	03/07	NT	.375	174.08000	65.28
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577210	03/08	NT	6.692	174.00030	1,164.41
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577211	03/08	NT	.556	185.00000	102.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577212	03/09	NT	4.000	185.00000	740.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577214	03/09	NT	4.000	185.00000	740.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577220	03/13	NT	1.876	185.00000	347.06
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577221	03/13	NT	.797	185.06901	147.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577223	03/13	NT	1.876	185.00000	347.06
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577225	03/13	NT	1.078	185.12059	199.56
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577227	03/13	NT	3.752	185.00000	694.12
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577229	03/13	NT	.211	185.02370	39.04
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577230	03/13	NT	1.750	185.00000	323.75
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577231	03/13	NT	.422	185.04739	78.09
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577234	03/13	NT	1.407	185.00355	260.30
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577236	03/14	NT	.902	185.14412	167.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577239	03/14	NT	.938	185.00000	173.53
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577241	03/14	NT	1.965	185.02290	363.57
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577243	03/14	NT	2.250	185.00000	416.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577249	03/14	NT	1.668	185.00000	308.58
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577253	03/14	NT	.091	185.38462	16.87
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577256	03/15	NT	1.692	185.00000	313.02
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577266	03/15	NT	.706	185.19830	130.75
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577267	03/15	NT	.234	185.38462	43.38
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577268	03/16	NT	1.758	185.07964	325.37
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577269	03/16	NT	1.465	185.07850	271.14

BRANCH 57

PRODUCT NUMBER	PRODUCT DESC	CUST NUMBER	CUST NAME	ORDER NUMBER	ACTUAL SHIP DATE	U/M	QUANTITY SHIPPED	UNIT PRICE	EXTENDED PRICE
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577276	03/16	NT	.834	185.60432	149.79
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577277	03/16	NT	.456	185.00000	84.36
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577280	03/20	NT	3.500	185.00000	647.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577281	03/20	NT	1.195	185.14644	221.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577283	03/20	NT	2.507	185.03789	463.89
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577284	03/20	NT	3.500	185.00000	647.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577286	03/20	NT	4.300	185.03256	795.64
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577288	03/21	NT	.150	185.06667	27.76
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577289	03/21	NT	.253	185.37549	46.90
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577293	03/24	NT	1.055	185.04265	195.22
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577297	03/27	NT	.469	185.01066	86.77
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577298	03/27	NT	.938	185.00000	173.53
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577299	03/27	NT	14.000	185.00000	2,590.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577301	03/28	NT	3.500	185.00000	647.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577309	03/29	NT	.703	185.13514	130.15
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577316	03/30	NT	2.500	185.00000	462.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577321	03/31	NT	.469	185.01066	86.77
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577323	03/31	NT	.703	185.13514	130.15
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577324	03/31	NT	.812	185.00000	150.22
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577327	03/31	NT	2.000	185.00000	370.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577332	04/01	NT	.760	185.11842	140.69
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577333	04/01	NT	.304	185.29605	56.33
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577342	04/04	NT	.562	185.26690	104.12
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577343	04/05	NT	1.015	185.00493	187.78
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577344	04/05	NT	1.380	185.05073	255.37
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577345	04/05	NT	4.221	185.00119	780.89
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577346	04/05	NT	1.758	185.07964	325.37
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577350	04/05	NT	.562	185.26690	104.12
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577353	04/05	NT	.797	184.80552	147.29
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577355	04/06	NT	2.006	185.00000	371.11
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577361	04/06	NT	3.824	185.00000	707.44
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577362	04/06	NT	1.000	185.00000	185.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577365	04/06	NT	.703	185.13514	130.15
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577367	04/06	NT	2.629	185.00190	486.37
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577368	04/06	NT	1.829	185.00820	338.38
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577370	04/06	NT	.469	185.01066	86.77
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577371	04/07	NT	1.172	185.07679	216.91
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577376	04/07	NT	2.390	185.00000	442.15
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577377	04/07	NT	.182	185.71429	33.80
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577378	04/07	NT	.250	185.56000	46.39
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577379	04/07	NT	.956	185.00000	176.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577382	04/07	NT	.070	185.85714	13.01
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577387	04/08	NT	1.434	185.00000	265.29
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577388	04/08	NT	4.000	185.00000	740.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577389	04/08	NT	1.055	185.04265	195.22
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577390	04/08	NT	.956	185.00000	176.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577391	04/08	NT	1.876	185.00000	347.06
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577395	04/10	NT	2.961	185.00169	547.79
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577396	04/10	NT	2.820	185.01418	521.74
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577397	04/10	NT	1.334	185.05247	246.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577399	04/10	NT	.820	185.17073	151.84

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52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577406	04/10	NT	2.000	185.00000	370.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577408	04/11	NT	.956	185.00000	176.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577409	04/11	NT	.938	185.00000	173.53
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577410	04/11	NT	.556	185.00000	102.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577412	04/11	NT	3.752	185.00000	694.12
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577422	04/11	NT	.717	185.00697	132.65
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	939	04/14	NT	3.127-	159.02462	497.27-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577435	04/14	NT	2.641	167.67891	442.84
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577436	04/15	NT	.375	185.09333	69.41
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577438	04/17	NT	.342	185.00000	63.27
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577439	04/17	NT	1.434	185.00000	265.29
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577442	04/17	NT	.938	185.00000	173.53
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577443	04/18	NT	.556	185.00000	102.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577445	04/18	NT	.703	185.13514	130.15
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577449	04/18	NT	5.684	185.00000	1,051.54
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577450	04/18	NT	4.259	185.02231	788.01
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577452	04/18	NT	.469	185.01066	86.77
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577453	04/18	NT	.609	185.00821	112.67
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577455	04/19	NT	.703	185.13514	130.15
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577473	04/20	NT	.609	185.00821	112.67
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577475	04/21	NT	1.600	185.00000	296.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577477	04/21	NT	2.500	185.00000	462.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577479	04/21	NT	.351	185.38462	65.07
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577483	04/21	NT	.478	185.00000	88.43
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577489	04/24	NT	4.244	185.00000	785.14
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577490	04/24	NT	2.502	185.00000	462.87
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577491	04/24	NT	3.752	185.00000	694.12
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577495	04/24	NT	7.467	185.01942	1,381.54
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577497	04/24	NT	3.892	183.95940	715.97
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577498	04/24	NT	1.946	183.96197	357.99
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577500	04/24	NT	2.625	187.00000	490.88
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577504	04/24	NT	1.112	185.00000	205.72
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577505	04/24	NT	.820	185.17073	151.84
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577507	04/24	NT	1.200	185.00000	222.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577508	04/24	NT	1.407	185.00355	260.30
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	489	04/25	NT	4.244-	185.00000	785.14-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577524	04/26	NT	10.100	185.00000	1,868.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577526	04/26	NT	2.571	185.03695	475.73
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577527	04/26	NT	1.000	185.00000	185.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577529	04/26	NT	1.253	185.10774	231.94
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577530	04/26	NT	.399	185.01253	73.82
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577533	04/27	NT	2.000	185.00000	370.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577542	04/28	NT	.586	185.08532	108.46
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	533	04/28	NT	2.000-	185.00000	370.00-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577543	04/28	NT	.750	185.00000	138.75
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577546	04/28	NT	4.000	185.00000	740.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577548	04/28	NT	.608	185.14803	112.57
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577551	04/28	NT	1.792	184.05134	329.82
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577552	04/28	NT	.492	185.16260	91.10
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577553	04/28	NT	2.462	185.02031	455.52
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577556	04/29	NT	2.250	185.00000	416.25

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52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577557	04/29	NT	1.755	185.02564	324.72
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577558	04/29	NT	1.876	185.00000	347.06
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577559	04/29	NT	1.880	185.06383	347.92
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577560	04/29	NT	.324	185.46296	60.09
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577561	04/29	NT	1.112	185.00000	205.72
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577565	04/29	NT	2.502	185.00000	462.87
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577567	04/29	NT	2.043	185.02692	378.01
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577568	05/01	NT	.611	185.18822	113.15
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577569	05/01	NT	15.000	185.00000	2,775.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577575	05/02	NT	.900	185.00000	166.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577577	05/03	NT	.711	185.13362	131.63
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577581	05/08	NT	1.055	185.04265	195.22
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577584	05/09	NT	.912	185.15351	168.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577585	05/09	NT	2.115	185.00236	391.28
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577588	05/09	NT	1.375	185.00364	254.38
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577590	05/09	NT	5.560	185.00000	1,028.60
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577594	05/09	NT	.684	185.00000	126.54
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577601	05/10	NT	2.000	185.00000	370.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577604	05/11	NT	3.000	185.00000	555.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577605	05/11	NT	1.500	185.00000	277.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577607	05/11	NT	.246	185.16260	45.55
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577609	05/11	NT	.556	185.00000	102.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577610	05/11	NT	8.000	185.00000	1,480.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577612	05/12	NT	.556	185.00000	102.86
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577613	05/12	NT	.501	185.18962	92.78
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577614	05/12	NT	.912	185.00000	168.72
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577615	05/12	NT	2.000	185.00000	370.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577616	05/12	NT	.243	185.18519	45.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577619	05/12	NT	.547	185.10055	101.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577621	05/12	NT	4.012	185.00000	742.22
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577623	05/12	NT	2.237	185.07376	414.01
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577624	05/12	NT	1.021	185.12243	189.01
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577626	05/12	NT	1.000	185.00000	185.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577628	05/12	NT	2.115	185.00236	391.28
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577629	05/12	NT	1.071	175.00467	187.43
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577633	05/15	NT	.799	175.18148	139.97
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577637	05/15	NT	.848	175.04717	148.44
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577640	05/16	NT	2.000	175.00000	350.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577641	05/16	NT	4.000	175.00000	700.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577642	05/16	NT	.243	185.18519	45.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577643	05/16	NT	.243	175.18519	42.57
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577645	05/16	NT	3.400	175.00000	595.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577646	05/16	NT	2.262	175.00000	395.85
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577650	05/17	NT	.942	175.00000	164.85
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577651	05/17	NT	2.262	175.00000	395.85
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577652	05/17	NT	.800	175.00000	140.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577653	05/17	NT	2.000	175.00000	350.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577658	05/17	NT	1.888	173.62818	327.81
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577660	05/17	NT	.933	175.01608	163.29
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577661	05/18	NT	.565	175.15044	98.96
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577663	05/18	NT	3.928	184.82434	725.99

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52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577666	05/18	NT	4.500	175.00000	787.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577668	05/18	NT	1.216	175.03290	212.84
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577672	05/18	NT	2.497	185.05006	462.07
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577673	05/18	NT	5.932	175.02360	1,038.24
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577675	05/18	NT	4.230	175.00000	740.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577680	05/19	NT	.900	175.00000	157.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577682	05/22	NT	1.825	175.04658	319.46
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577683	05/22	NT	.848	175.04717	148.44
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577684	05/22	NT	2.000	175.00000	350.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577686	05/22	NT	1.112	185.00000	205.72
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577695	05/24	NT	3.750	175.00000	656.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577702	05/25	NT	.700	175.00000	122.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577703	05/25	NT	.933-	175.01608	163.29-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577704	05/25	NT	.892	175.10090	156.19
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577705	05/25	NT	.846	175.00000	148.05
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577709	05/26	NT	3.675	175.03674	643.26
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577710	05/26	NT	2.856	175.00000	499.80
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577715	05/26	NT	2.120	175.05189	371.11
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577721	05/29	NT	.711	175.11955	124.51
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577722	05/29	NT	.711	175.11955	124.51
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577723	05/29	NT	1.413	175.09554	247.41
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577724	05/29	NT	1.696	175.05307	296.89
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577725	05/29	NT	2.262	175.00000	395.85
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577726	05/29	NT	3.000	175.00000	525.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577740	06/01	NT	3.500	175.00000	612.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577743	06/01	NT	.007	191.42857	1.34
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577746	06/02	NT	.476	175.00000	83.30
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577749	06/02	NT	2.500	175.00000	437.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577751	06/02	NT	1.648	175.00000	288.40
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577753	06/02	NT	.309	175.01618	54.08
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577755	06/02	NT	1.413	175.09554	247.41
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577756	06/02	NT	.848	175.04717	148.44
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577757	06/02	NT	1.131	175.00442	197.93
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577763	06/05	NT	7.917	175.00063	1,385.48
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577764	06/05	NT	.952	175.00000	166.60
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577768	06/07	NT	1.964	174.02240	341.78
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577769	06/07	NT	.304	175.46053	53.34
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577770	06/07	NT	1.413	175.09554	247.41
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577715	06/07	NT	2.120-	175.05189	371.11-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577772	06/07	NT	1.785	175.00280	312.38
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577773	06/08	NT	5.500	175.00000	962.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577774	06/08	NT	2.262	175.00000	395.85
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577775	06/08	NT	1.500	175.00000	262.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577778	06/08	NT	1.946	175.00000	340.55
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577782	06/08	NT	.706	175.21247	123.70
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577785	06/09	NT	.437	175.00000	76.48
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577787	06/09	NT	.350	175.00000	61.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577788	06/09	NT	1.500	175.00000	262.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577791	06/09	NT	.565	175.15044	98.96
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577796	06/09	NT	.809	175.04326	141.61
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577797	06/09	NT	3.110	175.01286	544.29

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52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577808	06/13	NT	.848	175.04717	148.44
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577809	06/14	NT	1.673	185.00299	309.51
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577811	06/14	NT	3.549	175.00141	621.08
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577815	06/14	NT	1.131	175.00442	197.93
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577817	06/14	NT	2.538	175.00000	444.15
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577818	06/14	NT	1.785	175.00280	312.38
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577821	06/15	NT	.424	175.04717	74.22
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577824	06/15	NT	.848	175.04717	148.44
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577825	06/21	NT	7.917-	175.00063	1,385.48-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577825	06/21	NT	7.917	155.53998	1,231.41
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577826	06/22	NT	.750-	185.00000	138.75-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577830	06/22	NT	2.028	175.00000	354.58
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577831	06/22	NT	.507	174.84221	88.64
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577832	06/22	NT	.547	162.32176	88.79
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577842	06/28	NT	.824	175.00000	144.20
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577843	06/28	NT	2.000	175.00000	350.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577844	06/28	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577849	06/28	NT	1.125	175.00000	196.88
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577865	06/29	NT	2.000	175.00000	350.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577871	06/30	NT	1.428	175.00000	249.90
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577873	06/30	NT	2.053	175.01218	359.30
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577878	07/06	NT	.565	175.15044	98.96
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577882	07/06	NT	.125	175.00000	21.88
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577883	07/06	NT	2.550	175.00000	446.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577900	07/12	NT	.486	175.18519	85.14
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577901	07/12	NT	.822	175.10949	143.94
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577914	07/21	NT	2.500	175.00000	437.50
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577921	07/25	NT	.657	175.00761	114.98
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577925	07/28	NT	2.961	175.00169	518.18
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577927	07/31	NT	4.000	175.00000	700.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577934	08/01	NT	1.240	175.08065	217.10
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577937	08/01	NT	1.696	175.05307	296.89
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577947	08/08	NT	.822	175.10949	143.94
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577948	08/09	NT	.587	175.14480	102.81
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	824	08/16	NT	.848-	175.04717	148.44-
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577959	08/17	NT	.822	175.10949	143.94
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577970	08/24	NT	1.131	175.00442	197.93
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577990	09/20	NT	.587	175.14480	102.81
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	577991	09/20	NT	.821	175.05481	143.72
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	578001	09/21	NT	22.275	165.00022	3,675.38
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	578003	09/22	NT	2.000	175.00000	350.00
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	578013	09/25	NT	1.190	175.00000	208.25
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	578014	09/26	NT	.547	175.15539	95.81
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	578019	09/27	NT	2.351	165.01914	387.96
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	578027	09/29	NT	2.500	169.78400	424.46
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	578030	10/06	NT	1.011	180.00000	181.98
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	578031	10/06	NT	.333	185.19520	61.67
52000	E-2 AMMONIUM NITRATE	88857	CASH SALE	578033	10/06	NT	.108	246.11111	26.58
			CUSTOMER 088857 TOTAL		635.763				112,034.95

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52000	E-2 AMMONIUM NITRATE	95260	[REDACTED]	576890	10/29	NT	.855	159.00585	135.95
52000	E-2 AMMONIUM NITRATE	95260	[REDACTED]	576918	11/03	NT	.855	146.84211	125.55
52000	E-2 AMMONIUM NITRATE	95260	[REDACTED]	890	11/03	NT	.855-	159.00585	135.95-
CUSTOMER 095260 TOTAL									
52000	E-2 AMMONIUM NITRATE	107800	[REDACTED]	577573	05/01	NT	4.865	185.00103	900.03
52000	E-2 AMMONIUM NITRATE	107800	[REDACTED]	577706	05/26	NT	2.120	175.05189	371.11
CUSTOMER 107800 TOTAL									
52000	E-2 AMMONIUM NITRATE	130645	[REDACTED]	577466	04/20	NT	6.500	185.00000	1,202.50
52000	E-2 AMMONIUM NITRATE	130645	[REDACTED]	577503	04/24	NT	3.500	185.00000	647.50
52000	E-2 AMMONIUM NITRATE	130645	[REDACTED]	577510	04/24	NT	2.931	185.01535	542.28
CUSTOMER 130645 TOTAL									
52000	E-2 AMMONIUM NITRATE	133908	CALVERT FA	576943	11/06	NT	6.000	159.00000	954.00
CUSTOMER 133908 TOTAL									
52000	E-2 AMMONIUM NITRATE	134327	[REDACTED]	547	04/28	NT	.556	185.00000	102.86
CUSTOMER 134327 TOTAL									
52000	E-2 AMMONIUM NITRATE	136440	THE CANNON	576871	10/24	NT	4.872	142.93925	696.40
52000	E-2 AMMONIUM NITRATE	136440	THE CANNON	576901	10/29	NT	7.308	142.94061	1,044.61
CUSTOMER 136440 TOTAL									
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576857	10/21	NT	3.500	154.00000	539.00
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576922	11/03	NT	3.179	106.42970	338.34
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576932	11/05	NT	.706	147.52125	104.15
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576933	11/05	NT	15.250	150.00000	2,287.50
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576951	11/08	NT	9.150	150.00000	1,372.50
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576955	11/08	NT	4.500	150.00000	675.00
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576960	11/09	NT	9.000	150.00000	1,350.00
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576964	11/10	NT	9.000	150.00000	1,350.00
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576965	11/10	NT	9.000	150.00000	1,350.00
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576968	11/11	NT	4.000	150.00000	600.00
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576970	11/12	NT	17.500	150.00000	2,625.00
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576977	11/15	NT	14.000	150.00000	2,100.00
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	576981	11/17	NT	15.000	150.00000	2,250.00
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	577050	01/10	NT	10.750	150.00000	1,612.50
52000	E-2 AMMONIUM NITRATE	145415	G & J CATT	577999	09/21	NT	140.000	165.00000	23,100.00
CUSTOMER 145415 TOTAL									
52000	52000	52000	52000	52000	52000	52000	264.535		41,653.99
52000	E-2 AMMONIUM NITRATE	146600	CEDAR HILL	577531	04/27	NT	4.012	185.00000	742.22
CUSTOMER 146600 TOTAL									
52000	E-2 AMMONIUM NITRATE	150777	[REDACTED]	577137	02/21	NT	4.000	175.00000	700.00
52000	E-2 AMMONIUM NITRATE	150777	[REDACTED]	577166	02/29	NT	4.000	175.00000	700.00
CUSTOMER 150777 TOTAL									
52000	E-2 AMMONIUM NITRATE	154405	CITY OF CE	623	01/18	NT	2.006-	163.99801	328.98-
52000	E-2 AMMONIUM NITRATE	154405	CITY OF CE	577536	04/27	NT	1.253	185.10774	231.94
52000	E-2 AMMONIUM NITRATE	154405	CITY OF CE	577731	06/01	NT	2.028	175.00000	354.90

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52000	E-2 AMMONIUM NITRATE	154405	CITY OF CE	577816	06/14	NT	2.028	175.00000	354.90	
52000	E-2 AMMONIUM NITRATE	154405	CITY OF CE	577939	08/03	NT	2.028	175.00000	354.90	
52000	E-2 AMMONIUM NITRATE	154405	CITY OF CE	577940	08/03	NT	2.028	175.00000	354.90	
			CUSTOMER	154405	TOTAL		7.359		1,322.56	
52000	E-2 AMMONIUM NITRATE	156175	[REDACTED]	577088	01/31	NT	4.400	159.00000	699.60	
52000	E-2 AMMONIUM NITRATE	156175	[REDACTED]	577155	02/28	NT	62.604	152.99997	9,578.41	
52000	E-2 AMMONIUM NITRATE	156175	[REDACTED]	577176	02/29	NT	7.402	153.01000	1,132.58	
52000	E-2 AMMONIUM NITRATE	156175	[REDACTED]	577186	03/01	NT	4.431	153.01286	678.00	
			CUSTOMER	156175	TOTAL		78.837		12,088.59	
52000	E-2 AMMONIUM NITRATE	183912	[REDACTED]	577822	06/15	NT	4.524	175.00000	791.70	
			CUSTOMER	183912	TOTAL		4.524		791.70	
52000	E-2 AMMONIUM NITRATE	194396	[REDACTED]	577039	12/28	NT	2.850	159.00000	453.15	
			CUSTOMER	194396	TOTAL		2.850		453.15	
52000	E-2 AMMONIUM NITRATE	195750	[REDACTED]	577274	03/16	NT	.938	185.00000	173.53	
52000	E-2 AMMONIUM NITRATE	195750	[REDACTED]	577662	05/18	NT	.952	175.00000	166.60	
			CUSTOMER	195750	TOTAL		1.890		340.13	
52000	E-2 AMMONIUM NITRATE	203400	DEAN	ELECT	577733	06/01	NT	1.059	175.12748	185.46
52000	E-2 AMMONIUM NITRATE	203400	DEAN	ELECT	577846	06/28	NT	.705	175.00709	123.38
52000	E-2 AMMONIUM NITRATE	203400	DEAN	ELECT	577860	06/28	NT	.705	175.00709	123.38
52000	E-2 AMMONIUM NITRATE	203400	DEAN	ELECT	577861	06/28	NT	.705	175.00709	123.38
52000	E-2 AMMONIUM NITRATE	203400	DEAN	ELECT	846	06/29	NT	.705-	175.00709	123.38-
52000	E-2 AMMONIUM NITRATE	203400	DEAN	ELECT	577875	07/05	NT	1.645	175.00304	287.88
52000	E-2 AMMONIUM NITRATE	203400	DEAN	ELECT	577905	07/14	NT	.705	175.00709	123.38
52000	E-2 AMMONIUM NITRATE	203400	DEAN	ELECT	577908	07/18	NT	.705	175.00709	123.38
52000	E-2 AMMONIUM NITRATE	203400	DEAN	ELECT	577916	07/25	NT	.705	175.00709	123.38
			CUSTOMER	203400	TOTAL		6.229		1,090.24	
52000	E-2 AMMONIUM NITRATE	206380	CITY OF DE	577949	08/10	NT	1.521	175.00329	266.18	
			CUSTOMER	206380	TOTAL		1.521		266.18	
52000	E-2 AMMONIUM NITRATE	211545	[REDACTED]	577369	04/06	NT	.844	185.04739	156.18	
			CUSTOMER	211545	TOTAL		.844		156.18	
52000	E-2 AMMONIUM NITRATE	236500	[REDACTED]	577372	04/07	NT	.717	185.00697	132.65	
			CUSTOMER	236500	TOTAL		.717		132.65	
52000	E-2 AMMONIUM NITRATE	245475	B HENRY ES	577719	05/26	NT	6.403	175.01328	1,120.61	
			CUSTOMER	245475	TOTAL		6.403		1,120.61	
52000	E-2 AMMONIUM NITRATE	259450	[REDACTED]	577687	05/22	NT	1.824	175.03838	319.27	
52000	E-2 AMMONIUM NITRATE	259450	[REDACTED]	577694	05/23	NT	1.824	175.03838	319.27	
52000	E-2 AMMONIUM NITRATE	259450	[REDACTED]	577876	07/05	NT	3.648	175.03564	638.53	
			CUSTOMER	259450	TOTAL		7.296		1,277.07	
52000	E-2 AMMONIUM NITRATE	263100	FISHER & P	577487	04/21	NT	2.931	185.01535	542.28	
52000	E-2 AMMONIUM NITRATE	263100	FISHER & P	577602	05/10	NT	4.221	185.00119	780.89	

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CUSTOMER 263100 TOTAL									
52000	E-2 AMMONIUM NITRATE	281998	FRI-TEX	DA 577665	05/18	NT	6.811	179.80032	1,224.62
52000	E-2 AMMONIUM NITRATE	281998	FRI-TEX	DA 577700	05/25	NT	3.405	174.02643	592.56
52000	E-2 AMMONIUM NITRATE	281998	FRI-TEX	DA 577859	06/28	NT	6.081	175.00740	1,064.22
52000	E-2 AMMONIUM NITRATE	281998	FRI-TEX	DA 577952	08/10	NT	2.432	175.03701	425.69
CUSTOMER 281998 TOTAL					18.729				3,307.09
52000	E-2 AMMONIUM NITRATE	286414	[REDACTED]	577074	01/25	NT	32.697	159.00450	5,198.97
52000	E-2 AMMONIUM NITRATE	286414	[REDACTED]	577096	02/01	NT	32.697	149.70425	4,894.88
52000	E-2 AMMONIUM NITRATE	286414	[REDACTED]	577098	02/01	NT	32.697	159.00450	5,198.97-
CUSTOMER 286414 TOTAL					32.697				4,894.88
52000	E-2 AMMONIUM NITRATE	310320	[REDACTED]	76997	11/20	NT	4.000	159.00000	636.00
52000	E-2 AMMONIUM NITRATE	310320	[REDACTED]	77020	11/30	NT	4.000	154.00000	616.00
52000	E-2 AMMONIUM NITRATE	310320	[REDACTED]	77031	12/02	NT	4.000	154.00000	616.00
52000	E-2 AMMONIUM NITRATE	310320	[REDACTED]	77033	12/03	NT	3.250	159.00000	516.75
52000	E-2 AMMONIUM NITRATE	310320	[REDACTED]	77540	04/27	NT	9.500	180.00000	1,710.00
CUSTOMER 310320 TOTAL					24.750				4,094.75
52000	E-2 AMMONIUM NITRATE	311020	[REDACTED]	577199	03/06	NT	6.768	175.00000	1,184.40
52000	E-2 AMMONIUM NITRATE	311020	[REDACTED]	577402	04/10	NT	.417	185.01199	77.15
52000	E-2 AMMONIUM NITRATE	311020	[REDACTED]	577783	06/08	NT	2.544	175.05110	445.33
52000	E-2 AMMONIUM NITRATE	311020	[REDACTED]	577910	07/19	NT	2.544	175.05110	445.33
CUSTOMER 311020 TOTAL					12.273				2,152.21
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	576903	10/29	NT	1.000	159.00000	159.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	576904	10/29	NT	1.413	159.08705	224.79
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577290	03/21	NT	.106	185.00000	75.11
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577300	03/27	NT	1.740	185.00000	321.90
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577314	03/29	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577328	03/31	NT	.543	185.24862	100.59
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577329	03/31	NT	.797	185.11920	147.54
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577334	04/03	NT	.652	185.13804	120.71
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577338	04/04	NT	.725	185.00690	134.13
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577358	04/06	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577366	04/06	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577403	04/10	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577404	04/10	NT	.500	185.00000	92.50
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577413	04/11	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577434	04/13	NT	.616	185.08117	114.01
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577440	04/17	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577444	04/18	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577448	04/18	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577457	04/19	NT	.500	185.00000	92.50
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577461	04/19	NT	.725	185.00690	134.13
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577474	04/20	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577499	04/24	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577514	04/25	NT	.833	185.16207	154.24
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577518	04/26	NT	.725	185.00690	134.13
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577525	04/26	NT	.500	185.00000	92.50

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52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577545	04/28	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577572	05/01	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577574	05/02	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577578	05/03	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577586	05/09	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577587	05/09	NT	.870	185.00000	160.95
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577608	05/11	NT	.833	185.16207	154.24
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577644	05/16	NT	.874	175.16018	153.09
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577654	05/17	NT	.801	175.19351	140.33
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577671	05/18	NT	.874	175.16018	153.09
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577701	05/25	NT	.874	175.16018	153.09
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577716	05/26	NT	.838	175.07160	146.71
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577728	05/31	NT	.500	175.00000	87.50
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577730	05/31	NT	.874	175.16018	153.09
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577742	06/01	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577761	06/05	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577771	06/07	NT	1.800	175.00000	315.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577777	06/08	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577781	06/08	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577798	06/12	NT	.900	175.00000	157.50
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577800	06/12	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577819	06/14	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577827	06/22	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577828	06/22	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577835	06/23	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577850	06/28	NT	.500	175.00000	87.50
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577853	06/28	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577854	06/28	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577866	06/29	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577867	06/29	NT	.500	175.00000	87.50
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577874	07/05	NT	.600	175.00000	105.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577877	07/06	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577889	07/07	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577892	07/10	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577894	07/11	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577906	07/17	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577907	07/18	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577911	07/19	NT	1.200	175.00000	210.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577917	07/25	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577931	07/31	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577932	07/31	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577946	08/08	NT	.650	175.00000	113.75
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577950	08/10	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577953	08/14	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577954	08/14	NT	.750	175.00000	131.25
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577965	08/21	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577966	08/21	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577971	08/28	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577972	08/28	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577978	09/07	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577984	09/11	NT	1.000	175.00000	175.00

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52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577986	09/14	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577987	09/15	NT	.250	175.00000	43.75
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577988	09/18	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577989	09/18	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	577997	09/21	NT	.600	175.00000	105.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	578011	09/25	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	578012	09/25	NT	1.000	175.00000	175.00
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	578018	09/27	NT	.500	175.00000	87.50
52000	E-2 AMMONIUM NITRATE	332300	H & H SERV	578025	09/29	NT	.250	175.00000	43.75
			CUSTOMER 332300 TOTAL		77.563				13,776.62
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	576821	10/11	NT	1.053	159.00285	167.43
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577132	02/18	NT	5.000	175.00000	875.00
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577174	02/29	NT	5.000	175.00000	875.00
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577257	03/15	NT	5.000	185.00000	925.00
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577271	03/16	NT	5.000	185.00000	925.00
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577393	04/08	NT	5.000	182.00000	910.00
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577414	04/11	NT	5.000	185.00000	925.00
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577470	04/20	NT	5.000	182.00000	910.00
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577484	04/21	NT	5.000	185.00000	925.00
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577528	04/26	NT	5.000	175.00000	875.00
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577532	04/27	NT	3.000	175.00000	525.00
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577727	05/31	NT	2.827	175.03007	494.81
52000	E-2 AMMONIUM NITRATE	358238	[REDACTED]	577732	06/01	NT	2.827	175.03007	494.81
			CUSTOMER 358238 TOTAL		54.707				9,827.05
52000	E-2 AMMONIUM NITRATE	368900	[REDACTED]	577060	01/18	NT	4.000	159.00000	636.00
52000	E-2 AMMONIUM NITRATE	368900	[REDACTED]	577595	05/10	NT	3.595	185.02643	665.17
52000	E-2 AMMONIUM NITRATE	368900	[REDACTED]	577657	05/17	NT	3.384	175.00000	592.20
			CUSTOMER 368900 TOTAL		10.979				1,893.37
52000	E-2 AMMONIUM NITRATE	392541	[REDACTED]	577611	05/11	NT	1.000	185.00000	185.00
52000	E-2 AMMONIUM NITRATE	392541	[REDACTED]	577627	05/12	NT	2.000	185.00000	370.00
			CUSTOMER 392541 TOTAL		3.000				555.00
52000	E-2 AMMONIUM NITRATE	411800	[REDACTED]	577851	06/28	NT	4.000	175.00000	700.00
52000	E-2 AMMONIUM NITRATE	411800	[REDACTED]	577852	06/28	NT	4.000	175.00000	700.00
52000	E-2 AMMONIUM NITRATE	411800	[REDACTED]	577855	06/28	NT	4.000	175.00000	700.00
			CUSTOMER 411800 TOTAL		12.000				2,100.00
52000	E-2 AMMONIUM NITRATE	420050	J & S CATT	577016	11/24	NT	.202	153.66337	31.04
52000	E-2 AMMONIUM NITRATE	420050	J & S CATT	577016	11/24	NT	5.700	150.00000	855.00
52000	E-2 AMMONIUM NITRATE	420050	J & S CATT	577541	04/27	NT	.500	180.00000	90.00
			CUSTOMER 420050 TOTAL		6.402				976.04
52000	E-2 AMMONIUM NITRATE	426104	[REDACTED]	577147	02/22	NT	2.500	175.00000	437.50
52000	E-2 AMMONIUM NITRATE	426104	[REDACTED]	577163	02/29	NT	1.692	175.00000	296.10
52000	E-2 AMMONIUM NITRATE	426104	[REDACTED]	577164	02/29	NT	2.500-	175.00000	437.50-
52000	E-2 AMMONIUM NITRATE	426104	[REDACTED]	577599	05/10	NT	3.000	185.00000	555.00
52000	E-2 AMMONIUM NITRATE	426104	[REDACTED]	577834	06/23	NT	.952	175.00000	166.60
			CUSTOMER 426104 TOTAL		5.644				1,017.70

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52000	E-2 AMMONIUM NITRATE	450708	[REDACTED]	577038	12/28	NT	4.000	159.00000	636.00
52000	E-2 AMMONIUM NITRATE	450708	[REDACTED]	577041	12/29	NT	3.500	159.00000	556.50
			CUSTOMER 450708	TOTAL			7.500		1,192.50
52000	E-2 AMMONIUM NITRATE	451800	[REDACTED]	577862	06/28	NT	1.094	175.10055	191.56
			CUSTOMER 451800	TOTAL			1.094		191.56
52000	E-2 AMMONIUM NITRATE	516846	[REDACTED]	577688	05/22	NT	1.650	175.00000	288.75
52000	E-2 AMMONIUM NITRATE	516846	[REDACTED]	577820	06/14	NT	3.500	175.00000	612.50
52000	E-2 AMMONIUM NITRATE	516846	[REDACTED]	577856	06/28	NT	2.500	175.00000	437.50
			CUSTOMER 516846	TOTAL			7.650		1,338.75
52000	E-2 AMMONIUM NITRATE	536562	[REDACTED]	576954	11/08	NT	3.000	159.00000	477.00
			CUSTOMER 536562	TOTAL			3.000		477.00
52000	E-2 AMMONIUM NITRATE	557110	[REDACTED]	577102	02/04	NT	4.913	159.00468	781.19
			CUSTOMER 557110	TOTAL			4.913		781.19
52000	E-2 AMMONIUM NITRATE	563880	[REDACTED]	577416	04/11	NT	1.000	185.00000	185.00
52000	E-2 AMMONIUM NITRATE	563880	[REDACTED]	577417	04/11	NT	6.000	185.00000	1,110.00
			CUSTOMER 563880	TOTAL			7.000		1,295.00
52000	E-2 AMMONIUM NITRATE	594100	[REDACTED]	577109	02/10	NT	2.000	159.00000	318.00
52000	E-2 AMMONIUM NITRATE	594100	[REDACTED]	577341	04/04	NT	2.000	185.00000	370.00
			CUSTOMER 594100	TOTAL			4.000		688.00
52000	E-2 AMMONIUM NITRATE	594227	[REDACTED]	577647	05/16	NT	1.500	175.00000	262.50
			CUSTOMER 594227	TOTAL			1.500		262.50
52000	E-2 AMMONIUM NITRATE	606464	[REDACTED]	577674	05/18	NT	2.400	175.00000	420.00
			CUSTOMER 606464	TOTAL			2.400		420.00
52000	E-2 AMMONIUM NITRATE	610280	[REDACTED]	577215	03/09	NT	2.500	185.00000	462.50
52000	E-2 AMMONIUM NITRATE	610280	[REDACTED]	577714	05/26	NT	4.230	175.00000	740.25
			CUSTOMER 610280	TOTAL			6.730		1,202.75
52000	E-2 AMMONIUM NITRATE	614560	[REDACTED]	577141	02/21	NT	3.000	175.00000	525.00
52000	E-2 AMMONIUM NITRATE	614560	[REDACTED]	577143	02/21	NT	1.500	175.00000	262.50
			CUSTOMER 614560	TOTAL			4.500		787.50
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	576902	10/29	NT	2.820	154.93972	436.93
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	902	11/01	NT	2.820-	154.93972	436.93-
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577126	02/17	NT	2.175	175.00230	380.63
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577180	03/01	NT	9.000	175.00000	1,575.00
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577240	03/14	NT	2.000	185.00000	370.00
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577306	03/28	NT	4.262	185.03285	788.61
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577330	04/01	NT	1.000	185.00000	185.00
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577481	04/21	NT	2.000	185.00000	370.00
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577485	04/21	NT	2.122	185.00000	392.57
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577554	04/28	NT	12.000	182.00000	2,184.00
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577563	04/29	NT	2.000	182.00000	364.00

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52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	85	05/09	NT	2.122-	185.00000	392.57-
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577591	05/09	NT	1.946	181.88078	353.94
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	81	05/09	NT	2.000-	185.00000	370.00-
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577592	05/09	NT	2.000	175.00000	350.00
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	63	05/10	NT	2.000-	182.00000	364.00-
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577596	05/10	NT	14.000	175.00000	2,450.00
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577597	05/10	NT	12.000-	182.00000	2,184.00-
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577669	05/18	NT	10.000	175.00000	1,750.00
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577707	05/26	NT	3.000	175.00000	525.00
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	577708	05/26	NT	2.262	175.00000	395.85
52000	E-2 AMMONIUM NITRATE	660890	K BAR RANC	77707	05/30	NT	3.000-	175.00000	525.00-
			CUSTOMER 660890				48.645		8,599.03
52000	E-2 AMMONIUM NITRATE	665203	[REDACTED]	577075	01/25	NT	10.725	150.00000	1,608.75
52000	E-2 AMMONIUM NITRATE	665203	[REDACTED]	577076	01/25	NT	3.445	150.00000	516.75
52000	E-2 AMMONIUM NITRATE	665203	[REDACTED]	577077	01/25	NT	5.500	150.00000	825.00
52000	E-2 AMMONIUM NITRATE	665203	[REDACTED]	577078	01/25	NT	2.255	150.00000	338.25
52000	E-2 AMMONIUM NITRATE	665203	[REDACTED]	577079	01/25	NT	1.725	150.00000	258.75
52000	E-2 AMMONIUM NITRATE	665203	[REDACTED]	577103	02/07	NT	1.450	159.00000	230.55
52000	E-2 AMMONIUM NITRATE	665203	[REDACTED]	103	08/14	NT	1.450-	159.00000	230.55-
			CUSTOMER 665203				23.650		3,547.50
52000	E-2 AMMONIUM NITRATE	690193	[REDACTED]	577294	03/24	NT	2.579	185.03684	477.21
52000	E-2 AMMONIUM NITRATE	690193	[REDACTED]	577307	03/28	NT	.762	185.02625	140.99
52000	E-2 AMMONIUM NITRATE	690193	[REDACTED]	307	03/29	NT	.762-	185.02625	140.99-
52000	E-2 AMMONIUM NITRATE	690193	[REDACTED]	577313	03/29	NT	.762	185.02625	140.99
52000	E-2 AMMONIUM NITRATE	690193	[REDACTED]	577717	05/26	NT	1.521	175.11506	266.35
52000	E-2 AMMONIUM NITRATE	690193	[REDACTED]	577840	06/27	NT	.762-	185.02625	140.99-
52000	E-2 AMMONIUM NITRATE	690193	[REDACTED]	577841	06/27	NT	.213-	212.06573	45.17-
52000	E-2 AMMONIUM NITRATE	690193	[REDACTED]	577858	06/28	NT	.178-	183.87640	32.73-
			CUSTOMER 690193				3.709		665.66
52000	E-2 AMMONIUM NITRATE	692075	PRESBYTERI	577216	03/10	NT	.126	186.11111	23.45
			CUSTOMER 692075				.126		23.45
52000	E-2 AMMONIUM NITRATE	692120	PRESTWICK	576880	10/28	NT	.507	158.99408	80.61
52000	E-2 AMMONIUM NITRATE	692120	PRESTWICK	577002	11/22	NT	.202	158.41584	32.00
52000	E-2 AMMONIUM NITRATE	692120	PRESTWICK	577008	11/22	NT	.202	158.41584	32.00
52000	E-2 AMMONIUM NITRATE	692120	PRESTWICK	577061	01/18	NT	.202	159.65347	32.25
52000	E-2 AMMONIUM NITRATE	692120	PRESTWICK	577062	01/18	NT	.405	159.23457	64.49
52000	E-2 AMMONIUM NITRATE	692120	PRESTWICK	577063	01/18	NT	.507	158.99408	80.61
52000	E-2 AMMONIUM NITRATE	692120	PRESTWICK	577208	03/07	NT	.405	174.24691	70.57
52000	E-2 AMMONIUM NITRATE	692120	PRESTWICK	577582	05/08	NT	.507	185.00986	93.80
			CUSTOMER 692120				2.937		486.33
52000	E-2 AMMONIUM NITRATE	702243	[REDACTED]	576846	10/18	NT	2.502	159.00080	397.82
52000	E-2 AMMONIUM NITRATE	702243	[REDACTED]	577729	05/31	NT	2.262	175.00000	395.85
			CUSTOMER 702243				4.764		793.67
52000	E-2 AMMONIUM NITRATE	706180	RED OAK I	577118	02/14	NT	.617	175.18639	108.09
52000	E-2 AMMONIUM NITRATE	706180	RED OAK I	577405	04/10	NT	.691	185.07960	127.89

OB9022A 252

ROCK04A

El Dorado Chemical Co
INVOICED ORDERS REPORT BY BRANCH/PRODUCT/CUSTOMER
10/01/99 - 10/11/00

10:32:26 10/11/00 PAGE 16

BRANCH 57

PRODUCT NUMBER	PRODUCT DESC	CUST NUMBER	CUST NAME	ORDER NUMBER	ACTUAL SHIP DATE	U/M	QUANTITY SHIPPED	UNIT PRICE	EXTENDED PRICE
52000	E-2 AMMONIUM NITRATE	706180	RED OAK I	577648	05/17	NT	.691	175.07960	120.98
52000	E-2 AMMONIUM NITRATE	706180	RED OAK I	577982	09/08	NT	1.700	175.00000	297.50
			CUSTOMER	706180	TOTAL		3.699		654.46
52000	E-2 AMMONIUM NITRATE	708179	WAXAHACHIE	576840	10/14	NT	.423	159.00709	67.26
52000	E-2 AMMONIUM NITRATE	708179	WAXAHACHIE	576999	11/22	NT	.478	158.99582	76.00
52000	E-2 AMMONIUM NITRATE	708179	WAXAHACHIE	577040	12/29	NT	.761	159.08016	121.06
52000	E-2 AMMONIUM NITRATE	708179	WAXAHACHIE	577523	04/26	NT	.877	185.13113	162.36
52000	E-2 AMMONIUM NITRATE	708179	WAXAHACHIE	577649	05/17	NT	.190	175.10526	33.27
52000	E-2 AMMONIUM NITRATE	708179	WAXAHACHIE	577915	07/21	NT	.205	175.26829	35.93
			CUSTOMER	708179	TOTAL		2.934		495.88
52000	E-2 AMMONIUM NITRATE	712239	RED OAK VA	578005	09/22	NT	.896	175.00000	156.80
			CUSTOMER	712239	TOTAL		.896		156.80
52000	E-2 AMMONIUM NITRATE	730315	[REDACTED]	577279	03/20	NT	2.814	185.00000	520.59
			CUSTOMER	730315	TOTAL		2.814		520.59
52000	E-2 AMMONIUM NITRATE	751850	BRIAN F WU	576920	11/03	NT	2.629	172.57893	453.71
			CUSTOMER	751850	TOTAL		2.629		453.71
52000	E-2 AMMONIUM NITRATE	752275	SARA FARMS	576833	10/14	NT	1.522	159.05388	242.08
52000	E-2 AMMONIUM NITRATE	752275	SARA FARMS	576845	10/18	NT	1.522	142.98949	217.63
52000	E-2 AMMONIUM NITRATE	752275	SARA FARMS	833	10/18	NT	1.522-	159.05388	242.08-
52000	E-2 AMMONIUM NITRATE	752275	SARA FARMS	576859	10/22	NT	3.090	142.97087	441.78
52000	E-2 AMMONIUM NITRATE	752275	SARA FARMS	577320	03/31	NT	1.015	185.00493	187.78
			CUSTOMER	752275	TOTAL		5.627		847.19
52000	E-2 AMMONIUM NITRATE	802404	[REDACTED]	576946	11/08	NT	1.217	164.00164	199.59
			CUSTOMER	802404	TOTAL		1.217		199.59
52000	E-2 AMMONIUM NITRATE	803401	[REDACTED]	577634	05/15	NT	4.000	175.00000	700.00
			CUSTOMER	803401	TOTAL		4.000		700.00
52000	E-2 AMMONIUM NITRATE	810336	[REDACTED]	576811	10/06	NT	4.567	144.49529	659.91
52000	E-2 AMMONIUM NITRATE	810336	[REDACTED]	576828	10/12	NT	5.785	144.49265	835.89
			CUSTOMER	810336	TOTAL		10.352		1,495.80
52000	E-2 AMMONIUM NITRATE	817149	SOUTHWESTE	576855	10/20	NT	.355	159.09859	56.48
52000	E-2 AMMONIUM NITRATE	817149	SOUTHWESTE	577767	06/07	NT	.360	175.25000	63.09
52000	E-2 AMMONIUM NITRATE	817149	SOUTHWESTE	577979	09/07	NT	.360	175.25000	63.09
			CUSTOMER	817149	TOTAL		1.075		182.66
52000	E-2 AMMONIUM NITRATE	818175	EDWIN SPAN	577356	04/06	NT	5.000	185.00000	925.00
			CUSTOMER	818175	TOTAL		5.000		925.00
52000	E-2 AMMONIUM NITRATE	818182	[REDACTED]	576988	11/19	NT	4.000	159.00000	636.00
52000	E-2 AMMONIUM NITRATE	818182	[REDACTED]	577110	02/11	NT	2.500	159.00000	397.50
52000	E-2 AMMONIUM NITRATE	818182	[REDACTED]	577537	04/27	NT	2.000	185.00000	370.00
			CUSTOMER	818182	TOTAL		8.500		1,403.50

OB9022A 252

ROCK04A

El Dorado Chemical Co
INVOICED ORDERS REPORT BY BRANCH/PRODUCT/CUSTOMER
10/01/99 - 10/11/00

10:32:26 10/11/00 PAGE 17

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b7C

BRANCH 57

PRODUCT NUMBER	PRODUCT DESC	CUST NUMBER	CUST NAME	ORDER NUMBER	ACTUAL SHIP DATE	U/M	QUANTITY SHIPPED	UNIT PRICE	EXTENDED PRICE
52000	E-2 AMMONIUM NITRATE	850617	T L N CATT	577185	03/01	NT	.054	175.00000	9.45
52000	E-2 AMMONIUM NITRATE	850617	T L N CATT	577407	04/10	NT	.430	185.09302	79.59
52000	E-2 AMMONIUM NITRATE	850617	T L N CATT	577678	05/18	NT	2.116	172.00378	363.96
52000	E-2 AMMONIUM NITRATE	850617	T L N CATT	577784	06/08	NT	2.827	175.03007	494.81
			CUSTOMER 850617			TOTAL	5.427		947.81
52000	E-2 AMMONIUM NITRATE	852176	[REDACTED]	577224	03/13	NT	1.125	185.10222	208.24
52000	E-2 AMMONIUM NITRATE	852176	[REDACTED]	577689	05/23	NT	2.262	175.00000	395.85
			CUSTOMER 852176			TOTAL	3.387		604.09
52000	E-2 AMMONIUM NITRATE	853550	[REDACTED]	577845	06/28	NT	.821	175.05481	143.72
			CUSTOMER 853550			TOTAL	.821		143.72
52000	E-2 AMMONIUM NITRATE	864500	WILBERT J	577004	11/22	NT	7.000	159.00000	1,113.00
			CUSTOMER 864500			TOTAL	7.000		1,113.00
52000	E-2 AMMONIUM NITRATE	879543	[REDACTED]	577138	02/21	NT	1.128	175.06206	197.47
52000	E-2 AMMONIUM NITRATE	879543	[REDACTED]	577386	04/08	NT	1.504	185.05984	278.33
52000	E-2 AMMONIUM NITRATE	879543	[REDACTED]	577464	04/20	NT	1.504	185.05984	278.33
52000	E-2 AMMONIUM NITRATE	879543	[REDACTED]	577476	04/21	NT	1.253	185.10774	231.94
52000	E-2 AMMONIUM NITRATE	879543	[REDACTED]	577848	06/28	NT	1.250	175.00000	218.75
			CUSTOMER 879543			TOTAL	6.639		1,204.82
52000	E-2 AMMONIUM NITRATE	897985	BRINT & CL	577030	12/02	NT	3.982	147.44601	587.13
52000	E-2 AMMONIUM NITRATE	897985	BRINT & CL	577679	05/18	NT	2.432	166.99424	406.13
52000	E-2 AMMONIUM NITRATE	897985	BRINT & CL	577699	05/24	NT	5.000	175.00000	875.00
			CUSTOMER 897985			TOTAL	11.414		1,868.26
52000	E-2 AMMONIUM NITRATE	898012	WALKER BRO	577070	01/21	NT	8.550	150.00000	1,282.50
52000	E-2 AMMONIUM NITRATE	898012	WALKER BRO	577364	04/06	NT	1.195	185.00418	221.08
52000	E-2 AMMONIUM NITRATE	898012	WALKER BRO	577698	05/24	NT	2.827	175.03007	494.81
			CUSTOMER 898012			TOTAL	12.572		1,998.39
52000	E-2 AMMONIUM NITRATE	898212	WALKER ACK	577380	04/07	NT	2.390	185.00000	442.15
			CUSTOMER 898212			TOTAL	2.390		442.15
52000	E-2 AMMONIUM NITRATE	898213	[REDACTED]	577677	05/18	NT	2.116	172.00378	363.96
			CUSTOMER 898213			TOTAL	2.116		363.96
						PRODUCT TOTAL	1,597.193		271,358.11
69300	SPREADING CHARGE	15625	[REDACTED]	577401	04/10	EA	69.000	3.00000	207.00
			CUSTOMER 015625			TOTAL	69.000		207.00
69300	SPREADING CHARGE	39639	[REDACTED]	576835	10/14	EA	50.000	5.00000	250.00
69300	SPREADING CHARGE	39639	[REDACTED]	576836	10/14	EA	100.000	5.00000	500.00
69300	SPREADING CHARGE	39639	[REDACTED]	576837	10/14	EA	105.000	5.00000	525.00
69300	SPREADING CHARGE	39639	[REDACTED]	576844	10/18	EA	82.000	3.50000	287.00
69300	SPREADING CHARGE	39639	[REDACTED]	576862	10/22	EA	157.000	5.00000	785.00
69300	SPREADING CHARGE	39639	[REDACTED]	576863	10/22	EA	343.000	5.00000	1,715.00

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/16/2000 b6
b7C

Lieutenant [redacted] WAXAHACHIE POLICE DEPARTMENT
(WPD), 216 North College, Waxahachie, Texas 75165, (972) 937-9940, provided copies of three police reports in which the EL DORADO CHEMICAL COMPANY facility in Waxahachie, Texas, had been burglarized by unknown individual(s). The dates of the incidents were June 14, 1999, June 22, 1999, and June 28, 1999.

The burglary which was reported on June 14, 1999, included the theft of about \$500.00 of Diammonium Phosphate in an unspecified amount. The burglary which was reported on June 22, 1999, included the theft of approximately five tons of Ammonia Sulfate (believed to be Ammonium Sulfate) valued at \$650.00. The third reported burglary which was reported on June 28, 1999, apparently did not have any item of value stolen except for three Master locks.

[redacted] stated he interviewed the [redacted] and the other employees. [redacted] stated he did not believe any EL DORADO CHEMICAL COMPANY employee was involved in the burglaries and thefts.

Investigation on 10/12/2000 at Dallas, Texas

File # 266A-DL-88532 -11 HAC Date dictated 10/16/2000
by SA [redacted] HSH

289M;h03,30Z

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Thursday, October 12, 2000

Service#: 99060194

INCIDENT RECEIPT INTERNAL COPY

System Number: WPD1999000377 Branch: WPD

Type: COM Complainant

Call#: Dispatcher

Status: S Status Date: 6/14/1999

Case#: Dispatch#: 99060194

Nature: BURGLARY OF BUILDING

Service#: 99060194

Major Offense Code

Offense#:

UCR:

IBR:

Offense Cd	Additional Offense Reported	UCR	A/C	Sts	As Of
05AF	Burglary-Forcible Entry/Non-Res Unknown	X	C	O	6/14/1999

Call Date/Time: 6/14/1999 10:00

Assigned To: [REDACTED]

b6
b7C

Dispatch Date/Time: 6/14/1999 10:00

FollowUpDate:

Case Date/Time: 6/14/1999 10:00

Alarm : N Permit :

Comp Date/Time: 6/14/1999 10:00

Permit# :

Expire :

File Date/Time: 6/15/1999 08:02

InvJuv :N Injuries :

Occur From D/T: 6/14/1999 10:00

Deaths :

Occur To D/T: 6/14/1999 10:00

Mon

Last Updated:

Tel:937-5717 Map:

Report Office: [REDACTED] [REDACTED]

ELDORADO CHEMICAL CO
111 GETZENDANER

Beat/Dist: 3

WAXAHACHIE

Vehicle:

Loc Beat/Dist:3

Lot1/2:

TX 75165

COMPLAINANT/VICTIM/WITNESS/SUSPECT/INFORMANT

HbMS Code: WPD0000000292 Adult? Y

Type: C

Telephone: [REDACTED]

DOB: [REDACTED]

Sex: M

b6
b7C

SSN: [REDACTED]

WAXAHACHIE TX 75165

Work: ELDORADO CHEMICAL CO.

Work Telephone: 937-5717

Narrative/Comment:

OFFICER SIGNATURE: _____

Waxahachie Police Department

APPROVED/SUPERVISOR: _____

Page 1 of 2

Thursday, October 12, 2000

Service#: 99060194

INCIDENT RECEIPT INTERNAL COPY

COMPLAINANT/VICTIM/WITNESS/SUSPECT/INFORMANT

HDMS Code: Adult? Type: Telephone: DOB: Sex:
SSN:

Work:

Work Telephone:

Narrative/Comment:

PROPERTY/EVIDENCE

Qty :	1.00	UM :	EA	Category :	RICO : N	PE :	Status :	Req Disp:
Description:DI-AMMONIUM PHOSPHATE				Model:				Serial:
Location:	Rec/Stl: S	Value:	\$500.00	UCR Code: K				

OFFICER SIGNATURE: _____

Waxahachie Police Department

APPROVED/SUPERVISOR: _____

Page 2 of 2

Thursday, October 12, 2000

Page Number:

1

Waxahachie Police Department

Description R/O MET WITH VICT IN REF TO BURGLARY OF BUILD

b6
b7C

Service #: 99060194

Date Entered 8:00:18 AM, 6/15/1999 User GCAMACHO

Narrative

99060194

ON MONDAY, 06-14-99, AT 09:55 HRS, I, OFFICER [REDACTED] WAS DISPATCHED TO 111 GETZENDANER, ELDORADO CHEMICAL CO, IN REF TO BURGLARY OF BUILDING.

UPON ARRIVAL I MET WITH REPORTING PERSON (R/P), [REDACTED] WHO STATED UNKNOWN PERSON/PERSONS ENTERED BUILDING #B THROUGH THE NORTH DOORS BY PRYING IT OPEN.

R/P STATES ONCE UNKNOWN PERSON/PERSONS WERE INSIDE, THEY OPENED THE NORTH BAY DOORS AND LOADED DI-AMMONIUM PHOSPHATE WITH A SMALL FRONT END LOADER INTO UNKNOWN TRUCK OR TRAILER. R/P PERSON WAS UNSURE HOW MUCH WAS TAKEN. R/P ALSO STATED THAT INVENTORY HAD BEEN COMING UP SHORT.

NO SUSPECT OR WITNESS INFORMATION.

R/P DID STATE THAT HE ARRIVED AT THE BUILDING ON 06-13-99 AT APPROX. 13:00 HRS, AND COULD SMELL FUMES FROM THE SMALL FRONT END LEADER BUT THOUGHT MAYBE A CO-WORKER HAD BEEN THERE.

Officer Signature (X) _____

WAXAHACHIE POLICE DEPARTMENT

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 12-11-2009 BY 60324 uc baw/sab/lsg

Thursday, October 12, 2000

Service#: 99060318

INCIDENT RECEIPT INTERNAL COPY

System Number: WPD1999000504 Branch: WPD
 Call#: Dispatcher
 Case#: Dispatch#: 99060318
 Service#: 99060318
 Offense#:

Type: **COM Complainant**
 Status: S Status Date: 6/22/1999
 Nature: BURG OF BUILDING
 Major Offense Code
 UCR: IBR:

Offense Cd	Additional Offense Reported	UCR	A/C	Sts	As Of
05AF	Burglary-Forcible Entry/Non-Res Unknown	X	C	O	6/22/1999

Call Date/Time: 6/22/1999 15:04
 Dispatch Date/Time: 6/22/1999 15:04
 Case Date/Time: 6/22/1999 15:04
 Comp Date/Time: 6/22/1999 15:04
 File Date/Time: 6/23/1999 09:33
 Occur From D/T: 6/22/1999 15:04 Tue
 Occur To D/T: 6/22/1999 15:04

Assigned To:
 FollowUpDate :
 Alarm : N Permit :
 Permit# : Expire :
 InvJuv : N Injuries :
 Deaths :

Last Updated:

Report Officer [REDACTED]

Beat/Dist: 3

Vehicle:

Lot1/2:

Tel: 937-5717 Map:
 EL DORADO CHEMICAL CO
 111 N. GETZENDANER
 WAXAHACHIE
 Loc Beat/Dist:3

TX 75165

ALL INFORMATION CONTAINED
 HEREIN IS UNCLASSIFIED
 DATE 12-11-2009 BY 60324 uc baw/sab/lsg

COMPLAINANT/VICTIM/WITNESS/SUSPECT/INFORMANT

HDMS Code: WPD0000004937 Adult? Y Type: W Telephone: [REDACTED]

DOB: [REDACTED] Sex: M

b6
b7C

SSN: [REDACTED]

Work: [REDACTED]

Work Telephone: [REDACTED]

Narrative/Comment: [REDACTED]

HAS ANOTHER LISTING PHONE [REDACTED]

COMPLAINANT/VICTIM/WITNESS/SUSPECT/INFORMANT

HDMS Code: WPD9900000283 Adult? Y Type: C Telephone: 938-0523

DOB: 12/1/1971 Sex: M

OFFICER SIGNATURE: _____

Waxahachie Police Department

APPROVED/SUPERVISOR: _____

Page 1 of 2

Thursday, October 12, 2000

Service#: 99060318

INCIDENT RECEIPT INTERNAL COPY

b6
b7C

Work:

Work Telephone:

Narrative/Comment:

WORKS AT EL DORADO CHEMICAL CO.

PROPERTY/EVIDENCE

Qty :	1.00	UM :	EA	Category :	RICO : N	PE :	Status :	Req Disp:
Description: 5 TONS OF AMONIA SULFATE AT \$130.00 A TON				Model:		Serial:		
Location:	Rec/Stl:S	Value:	\$650.00	UCR Code: K				

WAXAHACHIE POLICE DEPARTMENT

OFFICER SIGNATURE: _____

Waxahachie Police Department

APPROVED/SUPERVISOR: _____

Page 2 of 2

Thursday, October 12, 2000

Page Number: 1

Waxahachie Police Department

b6
b7c

Description UNKN PERSON(S) TOOK PROPERTY W/O CONSENT

Service #: 99060318

Date Entered 9:33:24 AM, 6/23/1999 User GCAMACHO

Narrative

99060318

ON 06-22-99, AT APPROX. 1444 HRS, I WAS DISPATCHED TO 111 N. GETZENDANER IN REGARDS TO A BURGLARY OF A BUILDING.

UPON ARRIVAL, I MET WITH THE REPORTING PERSON, [REDACTED] W/M, WHO STATED ON 06-21 TO 22 BETWEEN 1800-0800 THE SUSPECTS (UNKNOWN PERSONS) ENTERED THE ABOVE ADDRESS AT THE NORTHWEST SLIDING DOOR BY PULLING THE DOOR AWAY FROM THE BUILDING.

ONCE INSIDE, THE SUSPECT(S) THEN USED THE MACHINERY INSIDE (FRONT END LOADER) TO LOAD APPROX. 5 TONS OF AMONIA SULPHATE INTO A LEADER THEN HAD THE CHEMICAL PUMPED OUTSIDE WHERE A VEHICLE WOULD CATCH IT. THE R/P STATED THERE WERE ALSO OVER 5 TONS OF THE CHEMICAL STILL ON THE SCALES AT THE TIME OF DISCOVERY.

THE DISCOVERING PERSON IS [REDACTED] WHO CALLED THE R/P. THERE HAS BEEN NO RECENT FIRINGS.

Officer Signature (X) _____

WAXAHACHIE

Thursday, October 12, 2000

Service#: 99060419

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 12-11-2009 BY 60324 uc baw/sab/lsc

b6
b7C**INCIDENT RECEIPT INTERNAL COPY**

System Number: WPD1999000555 Branch: WPD

Type: COM Complainant

Call#: Dispatcher

Status: O Status Date: 6/28/1999

Case#: Dispatch#: 99060419

Nature: BURGLARY OF A BUILDING

Service#: 99060419

Major Offense Code

Offense#:

UCR:

IBR:

Offense Cd	Additional Offense Reported	UCR	A/C	Sts	As Of
05AF	Burglary-Forcible Entry/Non-Res Unknown	X	C	O	6/28/1999

Call Date/Time: 6/28/1999 21:34

Assigned To: [REDACTED]

Dispatch Date/Time: 6/28/1999 21:34

FollowUpDate :

Case Date/Time: 6/28/1999 21:34

Alarm : N Permit :

Comp Date/Time: 6/28/1999 21:34

Permit# : Expire :

File Date/Time: 6/29/1999 08:19

InvJuv : N Injuries :

Occur From D/T: 6/28/1999 21:34

Mon

Deaths :

Occur To D/T: 6/28/1999 21:34

Tel:937-5717 Map:
 EL DORADO CHEMICAL CO.
 111 GETZENDANER
 WAXAHACHIE
 Loc Beat/Dist:3

TX 75165

Last Updated:

Report Office: [REDACTED]

Beat/Dist: 3

Vehicle: -

Lot1/2:

COMPLAINANT/VICTIM/WITNESS/SUSPECT/INFORMANT					
HDMS Code: WPD00000004037	Adult? Y	Type: W	Telephone: [REDACTED]	DOB: [REDACTED]	Sex: M
SSN: [REDACTED]					

Work:

Work Telephone:

Narrative/Comment:

HAS ANOTHER LISTING PHONE [REDACTED] WORKS AT EL DORADO CHEMICAL COMPANY, WAXA, TX,
 75165, [REDACTED]

COMPLAINANT/VICTIM/WITNESS/SUSPECT/INFORMANT

OFFICER SIGNATURE: _____

Waxahachie Police Department

APPROVED/SUPERVISOR: _____

Page 1 of 2

Thursday, October 12, 2000

Service#: 99060419

INCIDENT RECEIPT INTERNAL COPY

HDMS Code: WPD000000000000	Adult? Y	Type: C	Telephone: _____	DOB: _____	Sex: M
SSN: _____					

Work:

Work Telephone:

Narrative/Comment:

WORKS AT EL DORADO CHEMICAL CO.

PROPERTY/EVIDENCE

Qty : 1.00	UM : EA	Category :	RICO : N	PE :	Status :	Req Disp:
Description:3 MASTER LOCK PAD LOCKS				Model:	Serial:	
Location:		Rec/Stl: S	Value:	\$20.00 UCR Code: K		

PROPERTY/EVIDENCE

Qty : 1.00	UM : EA	Category :	RICO : N	PE :	Status :	Req Disp:
Description:SITING ON THE NORTHWEST SIDE OF BUILDING				Model:	Serial:	
Location:		Rec/Stl: O	Value:	\$50.00 UCR Code:		

OFFICER SIGNATURE: _____

Waxahachie Police Department

APPROVED/SUPERVISOR: _____

Page 2 of 2

Thursday, October 12, 2000

Page Number:

1

Waxahachie Police Department

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Description R/O WAS DISP TO LOC IN REF TO BURGLARY

Service #:

Date Entered User

Narrative

99060419

ON 06-28-99, AT APPROX. 21:34 HRS. R/O WAS DISPATCHED TO 111 GETZENDANER (EL DORADO CHEMICAL CO.) TO MEET WITH R/ [REDACTED] IN REFERENCE TO A BURGLARY OF A BUILDING.

R/O UPON ARRIVAL MET WITH THE R/P WHO ADVISED, ON 06-28-99, AT APPROX. 17:00-20:45 HRS. AN UNKNOWN SUSPECT(S) ENTERED THE BUILDING BY USING A CHAIR THAT WAS ALREADY ON THE NORTHWEST SIDE OF THE BUILDING. THE SUSPECT(S) PULLED BACK A PIECE OF SITING AND ENTERED THE BUILDING BY LIFTING THEMSELVES OVER THE INSIDE WALL, AND ENTERED WITHOUT THE OWNERS PERMISSION. THE SUSPECT(S) LEFT THE BUILDING BY EXITING THE NORTH DOOR, THE SUSPECT(S) HAD TO REMOVE THREE MASTER LOCK PAD LOCKS TO EXIT THE BUILDING. THE R/P CANNOT FIND THE PAD LOCK AND HE BELIEVES THE SUSPECT(S) TOOK THEM.

THE OFFENSE WAS DISCOVERED BY [REDACTED] EMPLOYEE, WHO ARRIVED ON THE LOCATION TO ACTIVATE THE OUTSIDE PERIMETER LIGHTING AT APPROX. 20:45 HRS. [REDACTED] NOTICED THE NORTH DOOR WAS UNSECURED, AND HE NOTIFIED THE R/P. THE R/P HAS FOUND NOTHING ELSE WAS MISSING AT THIS TIME.

Officer Signature (X) _____

WAXAHACHIE POLICE DEPARTMENT

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 12-11-2009 BY 60324 uc baw/sab/lsg

- 1 -

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/16/2000

Number (SSAN) [redacted] born [redacted] Social Security Account
[redacted] residing at [redacted]
[redacted] telephone number [redacted] was

interviewed at his place of employment, EL DORADO CHEMICAL COMPANY (EDC), 1950 Alpha Road, Suite 100, Rockwall, TX 75087, telephone number [redacted]. After being advised of the identities of the interviewing agents and the purpose of the interview, he provided the following information:

[redacted] advised agents he was employed by EDC as an [redacted] and was aware of the missing ammonium nitrate (AN) from the Waxahachie [redacted] [redacted] stated that audits conducted by ASB auditor [redacted] (phonetic) last week were accurate and confirmed that 143 tons of AN was missing from the Waxahachie site.

[redacted] stated it was his opinion that the missing AN was a result of sloppy workmanship and poor procedures at the Waxahachie EDC site. [redacted] also advised that normal attrition would account for periodic losses of chemicals, citing the example that his Bryan, TX site was currently missing five (5) tons of POTASH.

[redacted] explained that former Waxahachie [redacted] [redacted] who resigned in June 2000, was not properly performing the required monthly inventories. [redacted] advised that if the required audits/inventories would have been performed properly and on time, inventory discrepancies would have been found earlier. [redacted] stated that [redacted] had worked for him [redacted] once before at an EDC wholesale site in Trinity, TX. [redacted] explained that [redacted] did a good job at the wholesale site prior to leaving for another opportunity. [redacted] advised that he hired [redacted] again in December 1998 and placed him at the Waxahachie site. [redacted] described [redacted] as being "over his head" at the Waxahachie site due to the retail nature of the site as opposed to his earlier wholesale experience.

Investigation on 10/11/2000 at Rockwall, TX

File # 266A-DL-88532-12 Date dictated 10/16/2000

by SA MAC SA

290mac04. 302

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/11/2000 , Page 2

[redacted] further related that the weight scale was not calibrated properly at the Waxahachie site and this would lead to possible overfills of customer orders. Additionally, [redacted] stated that the Waxahachie site lacked a second weight scale to weigh filled buggies in comparison to the initial empty weight of the buggies. [redacted] described normal operating procedures as weighing the empty buggy, filling the buggy, weighing the filled buggy, and invoicing the difference. [redacted] stated the Waxahachie site was not following the procedure due to only having one scale.

[redacted] advised that subsequent audits were performed at EDC after [redacted] and [redacted] left in June 2000. [redacted] stated that invoices were discovered at the site that were not conducted properly and/or accurately deducted from inventory levels. Based on these discoveries, [redacted] speculated that material may well have been sold to customers and subsequently not invoiced.

When asked by agents if he had any suspicion that the material may have been stolen, [redacted] described that the Waxahachie site was the victim of three (3) burglaries in 1999. [redacted] recalled that di-ammonium phosphate (DAP) and POTASH was stolen but he was unsure of the quantities taken. [redacted] advised he was unsure if the incidents were reported to local law enforcement.

When asked by agents if he was aware of the situation involving the four (4) employees all departing EDC in late September 2000, [redacted] advised that he was. [redacted] stated that the four (4) former employees [redacted]

[redacted] and [redacted] all attended the same church in Waxahachie. [redacted] advised he did not know them personally but knew that they, as part of their religious beliefs, would not work on Saturday as it was their day for church. When asked if he had suspicions that any of the four (4) were involved in some manner with the missing material, [redacted] laughed and responded that "maybe [redacted] gave the stuff to fellow parishioners who were farmers".

[redacted] stated he had no definitive reason to suspect any of the four (4) were involved in stealing the missing material.

Prior to conclusion of the interview [redacted] advised he was amenable to further contact with agents regarding the situation.

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/17/2000

[redacted] born [redacted] Social Security
Account Number (SSAN) [redacted] residing at [redacted]

[redacted] telephone number [redacted], was interviewed at her residence. After being advised of the identities of the interviewing agents and the purpose of the interview, she provided the following information:

[redacted] advised agents she was formerly employed at the EL DORADO CHEMICAL (EDC) Waxahachie site as an [redacted] for former EDC [redacted]. She also stated she performed [redacted] duties while at EDC. [redacted] stated she started working at the EDC site in June or July 1999 through June 2000, at which time she departed for better opportunities. She advised she was hired by EDC in part time status with the promise that she would eventually become full time with full benefits. She described working for EDC full time hours at part time pay so she left for the [redacted]

When asked by agents if she was aware of the fact that 143 tons of AMMONIUM NITRATE (AN) was missing from the Waxahachie, TX EDC site, she replied that she was and that the inventory levels at the site were never accurate. [redacted] advised agents that the inventory levels of the chemicals, to include AN, were inaccurate when she started employment in 1999. When asked to confirm if a buggy, normally used for chemical loading, was missing from EDC, she replied that missing buggies are common at EDC. She stated that farmers will borrow the buggies for loads and then sometimes not bring them back for several months.

When asked by agents to elaborate on her claim of inaccurate EDC inventory levels, she provided several examples. She advised that customers would arrive and request to purchase various chemicals, to include AN, di-ammonium phosphate (DAP), and smaller quantity packaged types. She advised she would check inventory levels on her computer and the computer would indicate the items to be in stock. [redacted] stated she would subsequently go back into the warehouse and the chemicals would be out of stock.

Investigation on 10/13/2000 at Waxahachie, TX

File # 266A-DL-88532 -13 Date dictated 10/17/2000
SA [redacted] MAC
by SA [redacted]

291mac01.302

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/13/2000 , Page

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[redacted] further advised that the weigh scales used to weigh customer loads were off. She speculated that the scales were about 100 lbs off per ton. She described that customers would bring large "buggies" to the site and request purchases [redacted]. She advised that the buggies could hold approximately five (5) tons of AN. She described that as a result of the weigh scales being off, the greater the size of the load, the greater the inaccuracy. She further advised that the weigh scale printer was also broken. She described the weigh scale printer as designed to print the amount of load and subsequently the invoice amounts. [redacted] stated that with the weigh scale off and printer broken, all loads and load amounts were guess work by the employees. When asked by agents to estimate, over her one year employment, the amount of AN missing due to the weigh scale/printer problems, she estimated the amount missing at forty (40) to fifty (50) tons.

When asked by agents to describe the invoicing procedures at EDC, [redacted] once again described them as inaccurate. She advised that as the invoice clerk, she was responsible for the invoices. She described that the employees would task her to invoice various amounts of customer loads but without a printer for the weigh scale, she was never sure that the amount she invoiced was in fact the actual load amount. She advised that at least two (2) customers, one of whom had the last name of [redacted] (phonetic), had problems with payments. She advised that [redacted] would delay the invoices for these customers until he was assured of payments. This procedure, according to [redacted] would also hurt the inventory accuracy.

When asked by agents for information regarding inventory procedures at EDC, she replied that during her year of employment, EDC's parent company LSB from Oklahoma City, OK performed three (3) audits. She stated that the June 2000 audit by LSB indicated that 143 tons of AN was missing from the site. After the June 2000 audit, [redacted] stated she was tasked by EDC to go back through invoice and inventory files to assist in the search for the missing AN. She stated that she searched back into files dating from 1993 but had no success. [redacted] also advised that per EDC policy, monthly inventories were required of the chemicals on hand. She stated that she would prepare the monthly audit/inventory sheets for [redacted] but he would not routinely do them. [redacted] described [redacted] as "lazy" when it came to the inventories.

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/13/2000 , Page

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[redacted] also advised agents that the Waxahachie site was the victim of three (3) to four (4) burglaries in 1999. She advised she was unaware of the details of the burglaries but believed that DAP was stolen from the site. She further advised that a rumor existed that whoever committed the burglaries was a former EDC employee from another Texas EDC site due to the fact that the burglars knew how to operate the chemical loader. She stated that after one (1) of the break-ins, DAP was found by EDC employees inside the chemical loader.

When asked by agents if she had heard about the four (4) EDC employees quitting in late September 2000, she replied that she had. Agents then asked [redacted] to identify and describe the four (4). [redacted] identified the employees as [redacted] and [redacted]. When agents asked her if she knew [redacted] she replied that she did not. [redacted] advised she knew the [redacted] and [redacted] attended the same church in Waxahachie. She described the church as the "newsday" church on Sycamore Street in Waxahachie. [redacted] claimed she was not familiar with the church but thought it was a "cross between Mormons and Seventh Day Adventists". She described their beliefs included eating health food and drinking grass. She advised they did not believe in using doctors, public schools, or issuing Social Security Numbers. [redacted] further stated that [redacted] and the [redacted] were into anti-government/conspiracy beliefs and would use the Internet at work to go to those type of websites.

[redacted] described [redacted] as "quick-tempered" and she was scared of him based upon his temper. When asked by agents if she thought [redacted] would speak with the FBI regarding the chemicals, she replied that he would not based upon his anti-government beliefs. She speculated he would tell agents to leave his house. When asked by agents if she believed [redacted] may have stolen the missing AN, she replied that he had the opportunity based on having keys to the facilities. She indicated that he was not good at inventory work and routinely carried EDC chemicals in his company truck. She stated that when she attempted to balance inventory reports with the chemicals in his truck, he would reply that he "did not know" why the inventory would not balance. [redacted] also stated, however, that she had no specific reason to believe he stole the missing AN.

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/13/2000 , Page 4

[redacted] described the [redacted] as "very decent people". She advised that she worked with [redacted] and knew [redacted] from her [redacted] visiting [redacted] at EDC. She described [redacted] as "very nice" and that [redacted] was depressed over the death of her baby. She described [redacted] as much quieter than [redacted]. Speculated that the [redacted] would gladly speak with agents regarding the missing chemicals. [redacted] stated she had no belief that the [redacted] were involved in possibly stealing the chemicals.

[redacted] also provided names, as follows, of additional former EDC employees who worked at the Waxahachie site within the last two (2) years: [redacted] Waxahachie, TX; [redacted], Italy, TX; [redacted] (phonetic), Maypearl, TX; [redacted] Waxahachie, TX; and [redacted] Waxahachie, TX. [redacted] advised that [redacted] and [redacted] all performed loading and spreader work while at EDC. [redacted] stated that [redacted] was the former EDC [redacted] prior to [redacted] joining EDC. She additionally stated that [redacted] whose father she identified as farmer [redacted] might have knowledge of the missing chemicals. While [redacted] stated she had no proof, she speculated that [redacted] may have been taking money from the EDC cash drawer.

When asked to provide an average usage of AN for a field of one hundred (100) acres, she estimated that normal usage of AN was approximately 250-300 pounds per acre.

Prior to conclusion of the interview, [redacted] advised she was amenable to further contact with agents regarding the situation.

266A-DL-8853Z-14

MAC
10/16/00

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HEREIN IS UNCLASSIFIED
DATE 12-11-2009 BY 60324 uc baw/sab/lsg

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE

Date: 10/05/2000

To: Counterterrorism
✓DallasAttn: SSA
SSA [redacted]b6
b7CFrom: Oklahoma City
Squad 7
Contact: SA [redacted]

405/290-3619

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b7C

Approved By: [redacted] JET

Drafted By: [redacted] lcm JM

Case ID #: 266-DL-0 (Pending) -464
266-OC-0 (Pending) -391b6
b7CTitle: Information Concerning:
143 Tons of Ammonium Nitrate
Discovered Missing From
EL DORADO CHEMICAL COMPANY,
Waxahachie, Texas;
AOT-DT-VC

Synopsis: To forward information regarding 143 Tons of Ammonium Nitrate that has been discovered missing from EL DORADO CHEMICAL COMPANY, Waxahachie, Texas.

Details: On 10/5/2000 writer was telephonically contacted by [redacted] Legal Department, LSB INDUSTRIES, 16 South Pennsylvania, Oklahoma City, Oklahoma, telephone [redacted] who provided the following information:

LSB INDUSTRIES (LSB) is the parent company for EL DORADO CHEMICAL COMPANY (EDC) in Waxahachie, Texas, telephone 972/937-5717. In July, 2000 an annual physical inventory at EDC revealed that approximately \$50,000 in inventory was missing from this business. Included in the missing inventory was approximately 143 Tons of bulk high density Ammonium Nitrate. Other components of fertilizer were also discovered to be missing during the inventory.

On October 4, 2000 four of the six employees at EDC all resigned. These employees are all members of a religious cult known as the CHURCH OF GOD in Waxahachie. They had requested some days off from work because of the current position of the moon. Their requests were denied so they resigned from EDC.

SEARCHED _____ INDEXED _____
SERIALIZED _____ FILED _____

OCT 12 2000

FBI-DALLAS

To: Counterterrorism From: Oklahoma City
Re: 266-DL-0, 10/05/2000

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[redacted] office was just made aware of the results of the July inventory on 10/4/2000. She does not know if any of the four persons who resigned were responsible for the missing Ammonium Nitrate but she wanted to report the situation. The last physical inventory at EDC by an outside person prior to July, 2000 took place in approximately July, 1999.

[redacted] identified the resigning EDC employees as follows:

1. [redacted] SSAN [redacted] Date of Birth
[redacted] home address [redacted]
telephone [redacted]

2. [redacted] SSAN [redacted] Date of Birth
[redacted] home address [redacted]
telephone [redacted]

3. [redacted] SSAN [redacted] Date of Birth
[redacted] home address [redacted]
telephone [redacted]

4. [redacted] SSAN [redacted] Date of Birth
[redacted] home address [redacted]
telephone [redacted]

Indices checks on the above individuals are negative. In addition to these individuals, two other EDC employees have resigned since June, 2000. They are:

1. [redacted] SSAN [redacted] Date of Birth
[redacted] home address [redacted]
telephone [redacted]

2. [redacted] SSAN [redacted] Date of Birth
[redacted] home address [redacted]
telephone [redacted]

A [redacted] of EDC, [redacted] is at the Waxahachie location today and can be reached at telephone 972/937-5717 if additional information is needed regarding this incident. The above information is being provided to the Dallas Division for whatever action deemed appropriate.

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HEREIN IS UNCLASSIFIED
DATE 12-11-2009 BY 60324 uc baw/sab/lsg

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From: [redacted]
To: [redacted]
Date: 10/6/00 9:11AM
Subject: Ammonium Nitrate

Gents,

Some further info. The bulk AN missing was 34-00-00. The 34 corresponds to the Nitrogen content in the product. This Nitrogen content is considered to be a threshold value for use in making explosives. AN is hydrophilic, ie - it absorbs water. When it is sufficiently humidified, it is a poor explosive precursor. However, it can be de-humidified quite easily and then used for explosives.

It's most common usage for explosives is ANFO - Ammonium Nitrate and Fuel Oil (Kerosene, Diesel and others). Typically this is 92% AN and 8% FO. ($\text{NH}_4 \text{NO}_3$) At the point it becomes ANFO (and if mixed correctly) it is a relatively useful "improvised" blasting agent with a detonating velocity of about 9,000 fps (C-4 is about 26,400). It is NOT cap sensitive and requires a booster. It is very insensitive to shock. It can be sensitized with Aluminum powder, among others.

The amount of ANFO used in OKC was roughly one (1) ton. (4,400 lbs.)

Let me know if I can provide more... [redacted]

(X)
MAC

2000AD 88532-15

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE**Date:** 10/17/2000**To:** Dallas**Attn:** Intelligence Unit;
IRS [redacted]b6
b7C**From:** Dallas

North Texas Joint Terrorism Task Force-DT

b6
b7C**Contact:** SA [redacted] 214/922-7774
SA [redacted] 14/922-7709**Approved By:** [redacted]b6
b7C**Drafted By:** [redacted]**Case ID #:** 266A-DL-88532 ✓ (Pending) -16**Title:** UNSUB (S);
143 TONS OF AMMONIUM NITRATE MISSING
FROM ELDORADO CHEMICAL COMPANY,
WAXAHACHIE, TEXAS;
AOT=DT-VC**Synopsis:** Request analytical assistance in the above matter.**Details:** On 10/05/2000, the North Texas Joint Terrorism Task Force (NTJTF) was contacted through EC by the Oklahoma City Field Office regarding 143 tons of Ammonium Nitrate reported missing from the EL DORADO CHEMICAL COMPANY, Waxahachie, TX. The Oklahoma City Field Office was telephonically contacted on 10/05/2000 by [redacted] Legal Department, LSB INDUSTRIES, 16 South Pennsylvania, Oklahoma City, OK. LSB INDUSTRIES is the parent company of EL DORADO CHEMICAL COMPANY.b6
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The initial EC from Oklahoma City has been provided to IRS Brady, and it is requested that she conduct logical database checks and provide analytic assistance in this matter.



293ABQ2.EC

ASSIST

2 - T. Heil
10/19/00b6
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266A-DL-88532-16

To: Dallas From: Dallas
Re: 266A-DL-88532, 10/17/2000

LEAD(s) :

Set Lead 1:

DALLAS

AT INTELLIGENCE UNIT

Conduct logical background searches and provide analytic assistance in the above investigation.

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- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/16/2000

[redacted] birth date [redacted]
[redacted] Social Security Account Number [redacted] residing at [redacted]

[redacted] employed with
[redacted] Waxahachie, Texas. was interviewed at [redacted]

Street, Waxahachie, Texas 75165. After being advised of the identity of the interviewing agents and the nature of the interview, he provided the following information:

[redacted] was employed with EL DORADO CHEMICAL COMPANY (EDCC) in Waxahachie, Texas, from December 1998 until June 2000 when he resigned. [redacted] for most of this time was

[redacted] After [redacted] in December 1998, he requested an inventory be conducted on all the products at the facility. [redacted] explained he requested this inventory in case some product or item was missing. [redacted] did not want to be blamed for losses which occurred before he became [redacted]. In February 1999, an inventory/audit was conducted at the EDCC facility in Waxahachie, Texas. [redacted] stated the February 1999 inventory determined seventy tons of Ammonium Nitrate (AN) was missing. [redacted] sent the EDCC headquarters in Rockwall, Texas, the information needed to clear the seventy tons; however, he was unsure if the seventy tons of AN was ever cleared from the Waxahachie facility inventory.

(X3)
HWT

In response to where he believed the one hundred forty three tons of AN may have gone, [redacted] stated he believed all could be attributed to shrinkage, providing too much to the customers (scales at the facility were incorrect) and no invoices being produced for the sale of the AN. [redacted] explained the scale in Waxahachie was calibrated for one thousand pounds; however, the scale could hold up to five tons. [redacted] believed the scale to be off two hundred pounds for every thousand pounds past one thousand pounds. [redacted] also speculated [redacted] as not performing her duties correctly as some invoices he requested she do were never entered into the computer and mailed out. [redacted] provided an example of one time when he went to look for an invoice for a farmer when EDCC spread AN on four hundred fifty acres. According to [redacted] told him the invoice was in the farmer's file but when he went to look for it, it was not there. [redacted] also

Investigation on 10/12/2000 at Waxahachie, Texas

File # 266A-DL-88532-11 Date dictated 10/16/2000
by SA MAC
SA HWT

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/12/2000 , Page 2

believed that farmers would come to the EDCC facility saying they were going to get four or five buggies which each holds ten thousand pounds of product. The farmer would get invoiced when the last load was finished; however, sometimes loads were not counted or a farmer would say he was going to come back for another load and never return. The buggy would be returned after business hours and EDCC would have to invoice the next day without the farmer being present. [redacted] went on to say that EDCC had been having problems with inventory since the early 1990's. EDCC allows for shrinkage of one half of one percent; however, [redacted] indicated the loss was at least ten percent equating to at least fifteen to twenty five tons.

[redacted] stated EDCC had been burglarized five or six times in August 1999 in which some "Phosphate" was stolen. [redacted] had no idea why anyone would want to steal "Phosphate" as it needed to be mixed with other chemicals for farm applications. [redacted] stated he attempted to stop future thefts of product by locking the loader keys in the office and even going to the point of unhooking the ignition on the loader. The ignition was left on the loader and the thief was able to replace the wires in the proper sequence to start the loader.

When [redacted] took over as [redacted] and [redacted] were already employed as workers under his supervision. [redacted] described [redacted] as an older man in his forties who was into Government conspiracy theories. [redacted] was apparently from the upper Midwest where he farmed. The floods in the upper Midwest several years ago "broke" [redacted]. [redacted] was a younger man from a farming family also into conspiracy theories. [redacted] stated both attended the Church of God church in Waxahachie, Texas, which have billboards stating United Nations troops are located in Texas. The Church of God also apparently publishes "Newswatch Magazine." [redacted] did not know if the Church of God owned any farming land. [redacted] stated [redacted] disliked authority and at times would ignore [redacted] and his directives.

[redacted] was questioned about the missing "buggy." [redacted] knew of one buggy which was rented out to farmer in September or October 1998 and never returned. [redacted] also knew of a buggy which was "wrecked."

[redacted] was questioned as to the monthly inventories that were his responsibility as the [redacted]. [redacted] stated he would estimate the product as it was too much work to empty a bin

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/12/2000, Page 3

and weigh the product. [redacted] explained the small bins would hold one hundred twenty five tons of product and the large bins held two hundred twenty five to two hundred fifty tons of product.

[redacted], was the [redacted] before he took over in 1998. [redacted]
also named [redacted] and [redacted]
the [redacted] before [redacted] as individuals who have knowledge of
the management problems at EDCC.

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/06/2000

Social Security Account Number [redacted] a white male, born [redacted]
Getzendaner, Waxahachie, Texas, 75168: work telephone number [redacted]
[redacted] home telephone number [redacted] employed as the [redacted]
of El Dorado Chemical Company (ECC)
was interviewed at the ECC facility in Waxahachie, Texas. After
being advised of the identity of the interviewing agents and that
the main purpose of the interview was to ascertain facts about 143
tons of Ammonium Nitrate fertilizer missing from ECC Waxahachie,
OTTO provided the following information:

[redacted] has only worked for ECC for about two weeks. [redacted]
formerly worked for an Agricultural-Coop company in the southern
part of Ellis County. [redacted] has worked in agriculture for his whole
life, having grown-up on a farm. When [redacted] began work at ECC,
there were five other employees. Those employees included [redacted]

and [redacted] [redacted] was the manager of these employees for
about eight work days.

[redacted] described four of these employees, [redacted]
[redacted] and [redacted] as being members of some "Texas
Republican church group called Church of God." He related that
their behavior was sometimes odd, citing examples of not using
soap, deodorant, or toothpaste for personal grooming. [redacted] further
described this church group as being located in Waxahachie, over
near the Southern Assembly of God University (SAGU). [redacted] has
driven by the church and described it as a rock building with a
printing shop located within. [redacted] believes that it has been
around for a couple of years. [redacted] likened the group to the WICCAN
religion that he saw on television.

[redacted] stated that all of the employees resigned on
September 28, 2000. The reason for their resignation, as related
to him by [redacted] was that they had to have September
29, 2000 off from work. [redacted] told [redacted] that it was
because of the position of the moon and their religious beliefs.
[redacted] told [redacted] this information late in the evening
on September 28, 2000. [redacted] remembers some reference to the "Feast

Investigation on 10/05/2000 at Waxahachie, TexasFile # 266A-DL-88532-18Date dictated 10/06/2000by SA
SSA280JST02.302

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/05/2000 , Page

2

of Trumpets." [redacted] took this to mean some religious holiday that the employees needed to attend.

[redacted] accepted the resignation of these four employees on Friday, September 29, 2000. At that time, [redacted] and [redacted] returned to ECC Waxahachie to turn in various work items such as, keys, uniforms, and radios. On Monday, October 2, 2000, [redacted] turned in his equipment.

Although [redacted] was only able to observe these individuals for eight days, he provided the following miscellaneous descriptions regarding their employment and character:

[redacted] Commercial Driver's License holder and [redacted] for ECC. The "leader" of the workers at ECC. A very quiet and reserved person. Spoke of taking from the government because they take all of his money in taxes; allegedly claims fourteen dependents on his tax return. Very committed to his the Church.

[redacted] at ECC. An animated and funny person at times. Not very involved with the church, but followed PALMER with loyalty.

[redacted] and [redacted] at ECC. Very computer literate, helped with the ECC computer system. Most animated and likeable of the group of employees at ECC. Very dominated by his wife, [redacted] on occasion when he was away from his wife, he "would act normal." Comes from a family of farmers in the Midwest United States.

[redacted] and [redacted] in the office. Very outspoken and dominant personality. Spoke openly about the Church; referred to the Church leader as the "high priest". Originally from New Jersey, emigrated to Texas to join the Church. "Educated" [redacted] about the customs and traditions of the Church, which included the strict diet regimen as prescribed by the "high priest." Told [redacted] that she drinks a mixture of distilled water, lemon juice and cayenne pepper ten times daily.

[redacted] remarked that [redacted] was not part of the Church. [redacted] worked as the [redacted] left for a better job elsewhere in town, and [redacted] was not sure where.

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/05/2000 , Page

3

[redacted] does not know if the former employees could have stolen 143 tons of Ammonium Nitrate. [redacted] believes it is possible that the fertilizer could have been sold by the employees for cash. [redacted] advised that often times the employees working at ECC Waxahachie are without direct supervision because he, like the managers before him, has to be out servicing client accounts. [redacted] reminded the interviewing agents that the fertilizer was missing prior to his starting employment with ECC Waxahachie. [redacted] had no further information to provide, but agreed to re-contact by the Federal Bureau of Investigation (FBI).

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FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 10/19/2000

[redacted] born [redacted] Social Security Account Number (SSAN) [redacted] was interviewed at his place of employment, EL DORADO CHEMICAL COMPANY, 111 Getzendaner Street, Waxahachie, TX 75168, telephone number (972) 937-5717. After being advised of the identities of the interviewing agents and the purpose of the interview, he provided the following information:

[redacted] advised agents he had given the missing ammonium nitrate (AN) situation some thought after his first interview with [redacted] agents. [redacted] stated he was of the opinion that the missing AN could be attributed to the weigh scale and weigh scale printer being off and his belief that employees, unbeknownst to EDC, were performing "side jobs" for cash. [redacted] described that over time, as in the last year, these problems would have added up to a lot of AN being missing.

[redacted] When asked by agents to visually inspect the weigh scale, [redacted] agreed and granted access. Agents observed that the scale provided a digital read-out on an LED screen and was reading fifty-five (55). When agents asked [redacted] about the read-out, he replied that the scales were empty and that the 55 was the read-out for 55 pounds. [redacted] stated that the scales would sometimes provide readings even when empty due to moisture and particles of chemicals remaining in the hopper after loads. [redacted] stated that the scale was always off and that approximately two (2) weeks earlier, the scale had read 92 pounds when empty.

[redacted] demonstrated to agents that pressing a button on the scale LED would "zero out" the read-out back to correct zero. When agents asked if other EDC employees knew how to zero-out the scale LED, [redacted] stated that he was currently teaching the others. He advised that when he took over the EDC manager position in September 2000, he asked former employee [redacted] who was still employed at the time, if he knew how to zero-out the scale prior to loading. [redacted] advised [redacted] he did not. [redacted] speculated to agents that scales being off as demonstrated, whether reading positive when empty or light when full, would cause inventory levels over time to be "way off". [redacted] further stated he was unsure if former EDC [redacted] knew how, or had taught the employees how to zero-out the scale.

Investigation on 10/17/2000 at Waxahachie, TX

File # 266A-DL-88532 - 19 Date dictated 10/19/2000
SA [redacted] :mac MAC
by SA [redacted] WH

293 Mac 01. 302

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/17/2000 , Page 2

When queried by agents as to loading procedures, [redacted] stated the correct way to load a farmer's buggy or truck was to first weigh the empty vehicle followed by a second weigh when load was completed. [redacted] stated that the invoice would be generated from the differences in the weight. [redacted] stated that EDC cannot currently, nor could have in the past year, performed that procedure due to the second weigh scale at the site being broken. [redacted] advised he was going to have both weigh scales fixed and/or calibrated in order to have a check and balance loading system. [redacted] described, when asked by agents, that the EDC site in Waxahachie would load, on a busy day, twenty-two (22) buggies of chemicals. [redacted] advised that a slow day would consist of ten (10) to fifteen (15) buggies. Agents, through prior interviews, have determined that the buggies will hold approximately five (5) tons each.

[redacted] explained that routine loading in the hopper would normally be inaccurate due to varying amounts of extra AN falling into the hopper. [redacted] described that AN will sometimes "clump up" and these clumps will fall into the hopper during the load, thereby adding to the load amount. [redacted] advised, which agents visually verified, that the hopper contains a steel grate over the top which prevents chemicals from being retrieved after loading in the hopper. [redacted] stated that if too much is placed into the hopper during a load, it's "there to stay".

Agents also asked [redacted] to describe former employees [redacted] and [redacted]. [redacted] advised that former EDC [redacted] was "scared" of [redacted] based upon [redacted] unwillingness to respect [redacted] authority. [redacted] described [redacted] as a "nice guy" and someone who would speak with agents. [redacted] speculated that [redacted] would tell agents "to get lost" if approached. [redacted] produced for agents two (2) copies of an October 2000 calendar which indicated that former EDC employees [redacted] and [redacted] had previously requested time off from work from 10/14/2000 through 10/22/2000. [redacted] advised the four (4) had told him the time off was for their "religious week". Both calendar sheet copies were retained by writer and subsequently placed in a 1A envelope.

[redacted] advised he was amenable to further contact with agents regarding the situation and would provide details of the weigh scale repair report once repair and/or calibration was completed.

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/18/2000

[redacted] white male, birth date [redacted]
Texas drivers license 11405127, residing at [redacted]
[redacted] home telephone [redacted]
cellular telephone [redacted] was interviewed at his place of
employment, EL DORADO CHEMICAL COMPANY (EDCC), 111 North
Getzendaner Street, Waxahachie, Texas 75165, telephone (972) 937-
5717. After being advised of the identity of the interviewing
agents and the nature of the interview, he provided the following
information:

[redacted] was recently rehired by EDCC to work as a [redacted]
[redacted] after working part-time at the Waxahachie [redacted]
facility in 1995 and again from September 1998 to December 1998.
[redacted] stated he heard from [redacted] that the EDCC Waxahachie
facility was missing one hundred forty three tons of Ammonium
Nitrate (AN) and that the Federal Bureau of Investigation (FBI) was
investigating the incident. [redacted] also stated he thought something
may have been wrong with past inventories after [redacted] changed
loading procedures for bulk products.

[redacted] stated each time he worked for the Waxahachie
facility, there seemed to be discrepancies in the bulk product
inventories and the main office always seemed to be worried about
the number of losses. 

[redacted] was questioned as to where he believed the one
hundred forty three tons of AN may be and he replied he had "no
idea" where it went.

[redacted] was queried as to the accuracy of the bulk product
scale. [redacted] stated he saw the scale calibrated in 1995 after a
lightning storm hit the bulk product building. [redacted] was under the
impression the scale was pretty accurate and was surprised the
scale was reading fifty five pounds when empty just before being
interviewed.

[redacted] worked with [redacted] in 1998 at the EDCC
Waxahachie facility. [redacted] described [redacted] as "goofy" and a
member of a church similar to the Seventh Day Adventist church.
According to [redacted] beliefs were five percent religion and

Investigation on 10/17/2000 at Waxahachie, TexasFile # 266A-DL-88532-20Date dictated 10/18/2000by SA [Signature]
SA [Signature]292 M403.302

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/17/2000

, Page 2

ninety five percent political. [redacted] did not like the government and would not be amenable to an interview by FBI Agents. [redacted] stated he had no information to believe [redacted] or anyone else had taken the AN but suspected if anyone would take the AN, it would be [redacted]. [redacted] stated he could "See [redacted] backing up a Ryder truck someplace." [redacted] saw numerous church friends of [redacted] stop by the facility but none of them drove trucks.

[redacted] also worked with [redacted] in 1998 and described [redacted] as friendly as both were relatively the same age. Even though [redacted] and [redacted] had the same political and religious beliefs, [redacted] believed [redacted] would be willing to talk to FBI personnel. [redacted] did not suspect [redacted] of any wrong doing.

[redacted] stated he had met [redacted] several times when [redacted] would come to Waxahachie to perform maintenance on a piece of equipment. [redacted] and [redacted] got along pretty well as both were from the same part of the United States.

[redacted] stated he never worked with [redacted] but his [redacted] had while he worked at EDCC. [redacted] provided a home telephone number for his [redacted] of [redacted]

[redacted] was questioned to any knowledge he had concerning product not being invoiced. [redacted] stated the only time he knew of product not being invoiced was when [redacted] spread AN on his personal pasture while he was [redacted] at the EDCC facility in Waxahachie, Texas. [redacted] stated this took place before the July 1999 inventory.

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/23/2000

The following investigation was conducted by
Financial Analyst (FA) [redacted] on 10/23/2000 in
Dallas, TX:

Utilizing an EL DORADO CHEMICAL COMPANY (EDC) Invoiced Orders report, dated 10/11/2000 and obtained by SA [redacted] FA [redacted] performed two (2) different estimates for potential invoice/inventory discrepancies for EDC AMMONIUM NITRATE (AN).

Potential EDC invoice/inventory discrepancies were based upon referenced EDC report, which reflected Invoiced Orders for AN in ton measurements from 10/01/1999 through 10/11/2000, and interview results obtained from SA [redacted]

One (1) copy of the completed report by FA [redacted] is attached hereto and made a permanent part of this FD-302. One (1) copy, accompanied by a copy of the referenced EDC report, was retained by SA [redacted] and placed into a 1A envelope.

Investigation on 10/23/2000 at Dallas, TX

File # 266A-DL-88532

by SA

Date dictated 10/23/2000

El Dorado Chemical CO.
Invoiced Orders
10/01/1999 - 10/11/2000

Total Tons Invoiced - 1597.193

Actual

$$\begin{aligned}1\text{ton}/2000 \text{ lbs} &= 1597.193\text{tons}/X \\1\text{ton}X &= (2000)(1597.193) \\X &= 3,194,386 \text{ lbs}\end{aligned}$$

El Dorado's Scale

$$\begin{aligned}1\text{ton}/2100 \text{ lbs} &= 1597.193\text{tons}/X \\1\text{ton}X &= (2100)(1597.193) \\X &= 3,354,105.3 \text{ lbs}\end{aligned}$$

OR

$$\begin{aligned}1\text{ton}/2200 \text{ lbs} &= 1597.193\text{tons}/X \\1\text{ton}X &= (2200)(1597.193) \\X &= 3,513,824.6 \text{ lbs}\end{aligned}$$

Differences

If 1 ton equals 2100 lbs:
El Dorado ton 3,354,105.3 lbs
Actual ton 3,194,386.0 lbs

If 1 ton equals 2200 lbs:
 3,513,824.6 lbs
 3,194,386.0 lbs

Difference 159,719.3 lbs
 or 79.86 tons

 319,438.6 lbs
 or 159.72 tons

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FEDERAL BUREAU OF INVESTIGATION

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b7C

Date of transcription

10/26/2000

Account Number (SSAN)

born [redacted]

Social Security

Texas Drivers License Number

residing at [redacted]

telephone number [redacted] 6. was interviewed at her residence
in the presence of her mother, [redacted][redacted] telephone number [redacted] After
being advised of the identity of the interviewing agent and the
purpose of the interview, she provided the following information:

[redacted] advised she was aware of the missing AMMONIUM NITRATE (AN) from EL DORADO CHEMICAL COMPANY (EDC) as she had discussed the situation with other employees, to include EDC [redacted] prior to leaving EDC in late September 2000. She stated that the missing AN was a mystery to all of the employees as all were curious as to what happened. She stated she was employed as a [redacted] at EDC for only about four (4) weeks. During her employment, she advised writer that she performed invoicing of customer orders and computer inventory work.

When asked by writer if EDC had a history of material inventory problems, she replied that her husband [redacted] worked at EDC for about two (2) years and had told her that EDC inventory was "always off". She advised she was not able to provide writer with details of why the inventory was off, however, she did state that when she arrived at the company in late August of 2000, the office was a mess and very disorganized. [redacted] advised she took the first week or two and spent the time trying to fix the mess she inherited. She speculated that the office disorganization might have led to inventory problems.

When asked by writer why she departed EDC, she stated that she and her husband, along with employees [redacted] and [redacted], had asked for a day off to celebrate a religious observance. She stated the company refused to grant the day off so she, along with the other three (3), did not show up for work. She claimed that the company subsequently fired them and in her opinion, it was religious discrimination that led to the termination. [redacted] stated to writer, however, that she and the others had forgiven the company based upon their religious beliefs.

Investigation on 10/23/2000 at Grandview, TX

File # 266A-DL-88532-25 Date dictated 10/26/2000

by SA [redacted] MAC

300 Mac 02. 302

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Continuation of FD-302 of [redacted]

, On 10/23/2000 , Page 2

When asked by writer if she had any reason to believe that employees of the company stole the missing AN or possibly conducted "back door" business transactions, [redacted] stated she did not. She advised writer that she and [redacted] along with [redacted] and [redacted] were religious people who took great pride in their integrity and efforts to always do right. [redacted] advised, however, that EDC was the victim of burglaries in 1999 and that chemicals were allegedly taken from the site.

Writer informed [redacted] that interviews were being conducted of current and former EDC employees and that [redacted] would need to be interviewed. She advised that he would be willing to talk with writer and the both of them would provide whatever assistance they could. When writer asked if she knew [redacted] personally and if she thought he would speak with writer, she replied that he would. She described [redacted] as a nice person but very quiet. She provided writer with [redacted] telephone number, [redacted] and advised he lived in Palmer, TX. She related to writer that [redacted] would also speak with writer and that she thought he currently resided in File Valley, TX.

[redacted] advised she was amenable to further contact and stated writer could come to her mother's residence the next evening to talk with [redacted]. She advised, which writer also observed, that her residence was incomplete as they were in the process of moving, and she felt more comfortable meeting at her mother's trailer.

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE**Date:** 10/25/2000b6
b7C**To:** Dallas**Attn:** IRS [redacted]**From:** Dallas

Domestic Terrorism
North Texas Joint Terrorism Task Force (NTJTTF)
Contact: SA [redacted] (214) 922-7774

b6
b7C**Approved By:** [redacted] *[Signature]*b6
b7C**Drafted By:** [redacted] ac *MAC***Case ID #:** 266A-DL-88532 (Pending) *23*

Title: UNSUB(S);
143 TONS OF AMMONIUM NITRATE MISSING
FROM EL DORADO CHEMICAL COMPANY,
WAXAHACHIE, TEXAS;
AOT-DT-VC

Synopsis: EC to report statistical accomplishment.

Details: On 10/13/2000, agents performed physical surveillance of residence located [redacted]. Residence was previously corroborated by agents as the location of a potential subject for captioned investigation.

Accomplishment Information:

Number: 1

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Type: NON-LOOKOUT PLATFORM SURVEILLANCE

ITU: PHYSICAL SURVEILLANCE

Claimed By: [redacted]

SSN: [redacted]

Name: [redacted]

Squad: Domestic Terrorism (DT)

Number: 1

Type: NON-LOOKOUT PLATFORM SURVEILLANCE

ITU: PHYSICAL SURVEILLANCE

Claimed By: [redacted]

SSN: [redacted]

Name: [redacted]

Squad: Domestic Terrorism (DT)

♦♦

297mac 02. 542

266A-DL-88532-23

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/20/2000

Number [redacted] born [redacted] Texas Drivers License [redacted]

[redacted] residing at [redacted] was interviewed at his place of employment, EL DORADO CHEMICAL COMPANY (EDC), 1950 Alpha Road, Suite 100, Rockwall, TX 75087, telephone number [redacted].

[redacted] After being advised of the identities of the interviewing agents and the purpose of the interview, he provided the following information:

[redacted] EDC [redacted] was advised by agents that numerous interviews had been conducted with current and former EDC employees and various points of contention were requiring resolution prior to additional interviews. [redacted] advised he was amenable to discussing the points of contention with agents.

Agents advised [redacted] that interviews were indicating that the Waxahachie EDC site had a history of inventory accountability problems. [redacted] responded by stating that small discrepancies had been noted over the last several years, but those problems included other chemicals as well as the missing AMMONIUM NITRATE (AN). [redacted] recalled however that in 1992 or 1993, thirty (30) tons of ammonium phosphate (AP) was missing from inventory levels in Waxahachie. [redacted] advised that the current 143 tons of missing AN was unusual for EDC. When agents asked [redacted] if the claim by former employees of 70 tons of AN being missing in February 1999 was accurate, he replied that he was unaware of that incident.

Agents asked [redacted] if he could run an inventory report for early 1999 which would capture the alleged missing 70 tons. [redacted] subsequently ran an EDC Inventory Transactions Inquiry report dated from 02/01/1999 through 06/30/1999. Agents, when presented with the report, observed that on 05/10/1999, EDC indicated an inventory transaction adjustment of 73.380 tons of AN. [redacted] advised that this transaction was indeed an inventory adjustment to 73.380 tons of AN reported missing. He estimated that the 73 tons of missing AN was most likely an accumulation over two (2) years of business.

Investigation on 10/17/2000 at Rockwall, TX

File # 266A-DL-88532 24 Date dictated 10/20/2000

SA [redacted] by SA [redacted] MJA

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/17/2000 , Page 2

[redacted] also produced for agents two additional EDC Inventory Transaction Inquiry reports, also dated from 02/01/1999 through 06/30/1999, which reflected inventory transaction adjustments on 05/10/1999 for 21.271 tons of MURIATE OF POTASH and 23.205 tons of DI-AMMONIUM PHOSPHATE. All three (3) referenced reports were retained by writer and placed into a 1A envelope.

[redacted] explained to agents that internal audits of EDC chemicals are performed once a year by parent company LSB INDUSTRIES and this 73 ton adjustment in May of 1999 would have been an attempt to rectify inventory levels. [redacted] advised agents that the current 143 tons of missing AN was not part of the 73 tons missing in 1999. He stated the May 1999 inventory adjustment would have temporarily rectified any inventory problems. According to [redacted] inventory problems started occurring after EDC implemented a facility manager position at Waxahachie. Prior to those positions being created, [redacted] stated he was in charge of inventory levels and would visit the site periodically from his office in Rockwall, TX.

[redacted] compared the Waxahachie site inventory problems with the EDC site in Bryan, TX. According to [redacted] the BRYAN, TX site is five (5) to six (6) times the size of the Waxahachie site and does not have serious inventory problems such as what occurred in Waxahachie. [redacted] stated the Bryan EDC facility manager is excellent with his inventory levels and accuracy.

When asked by agents if the EDC Waxahachie weigh scales and weigh scale printers were not functioning, he replied that the printer was not functioning but that one (1) of the weigh scales was operable. [redacted] advised agents that the weigh scale printer "went out" two (2) to three (3) years ago due to the inherent dirt, dust, and moisture inside the warehouse area. [redacted] stated that the printer would have no affect on inventory and/or load accuracy. When told by agents that others interviewed had speculated the weigh scale to be off by either one hundred (100) or two hundred (200) pounds, [redacted] stated he was unaware of that amount of discrepancy. [redacted] advised he was aware of the weigh scale once being off approximately fourteen (14) pounds.

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/17/2000 , Page 3

[redacted] described that the correct method of weighing/loading chemicals was to receive the customer order, take the batch (order) sheet to the loader, weigh the empty buggy, load the buggy, weigh the filled buggy, take the load amount paper to the office, and generate a true invoice from the filled buggy weight. When asked by agents if it was true that farm chemical companies such as EDC routinely sold extra chemical amounts, i.e. "baker's dozen sales" during routine transactions [redacted] replied that it was not a matter of policy even though it may occur accidentally.

When asked by agents if any employee performance issues relating to [redacted] would have affected the inventory, [redacted] replied that [redacted] did not do the required monthly inventories.

[redacted] described [redacted] as "good as gold", however, he stated [redacted] was not "detail oriented" when it came to inventory accuracy.

[redacted] according to [redacted] was hampered by his clerk [redacted].

[redacted] described [redacted] as "in and out" selling chemicals to customers which left [redacted] to maintain invoice accuracy.

According to [redacted] did not know the business and did not accurately update the computer inventory when invoices were completed.

After [redacted] and [redacted] departed EDC in June 2000, [redacted] estimated that he found at least twenty (20) invoices that had not been updated in the computer inventory. [redacted] described these invoices as containing various chemical sales, to include AN.

[redacted] advised it was impossible to tell how many invoices were never written down and subsequently not balanced with the computer. When asked by agents if the located invoices had been rectified by EDC [redacted] advised that they had and the 143 tons of missing AN was not part of those twenty (20) invoices. [redacted] further stated that LSB [redacted] (phonetic) had completed his audit work and no additional inventory balances needed checking. [redacted]

related to agents that after [redacted] and [redacted] left the company, he overheard various discussions with customers which led him to believe that an unknown amount of loads and customer purchases were not invoiced.

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/17/2000 , Page 4

When asked by agents if he had any reason to believe [redacted] and the [redacted] were involved in the missing AN [redacted] stated he did not. [redacted] however described [redacted] as "anti-government" and speculated that possibly [redacted] sold the AN out the back door to "poor farmers". [redacted] further described [redacted] as unable to accurately track inventory. [redacted] stated [redacted] would travel to see customers and would maintain various chemicals in the back of his company truck. According to [redacted] was never able to correctly balance the inventory with the amount of chemicals in the truck. [redacted] described [redacted] as a good applicator operator but with his inventory problems, it was possible that [redacted] serviced customer fields without conducting proper invoicing. According to [redacted] did not like answering to [redacted] and this possibly contributed to [redacted] not accurately conducting inventories of the chemicals in his truck. [redacted] further stated it was his belief that [redacted] "gave up" on [redacted] and let him [redacted] do what he wanted rather than fight with him.

[redacted] advised agents to also speak with former EDC employees [redacted] and [redacted] (phonetic). [redacted] advised that [redacted] worked for EDC in 1998. When asked by agents if he had ever heard allegations that [redacted] possibly stole or borrowed money from EDC without permission, [redacted] replied that he had not. [redacted] described [redacted] as the former EDC [redacted] and stated he worked for EDC for approximately four (4) years. [redacted] advised that [redacted] reported to former [redacted] and would possibly have knowledge of the Waxahachie EDC weigh scales being inaccurate. [redacted] stated that [redacted] currently worked for CHANDLER EQUIPMENT in CHANDLER, TX.

Prior to conclusion of the interview, [redacted] advised he was amenable to continued contact with agents regarding the situation.

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/26/2000

Security Account Number (SSAN) [redacted] born [redacted] Social Security Number [redacted] Texas Drivers License Number [redacted] residing at [redacted] telephone number [redacted] was interviewed at the residence of his mother-in-law, [redacted] telephone number [redacted]. After being advised of the identity of the interviewing agents and the purpose of the interview, he provided the following information:

[redacted] advised agents he was currently employed by [redacted]. Prior to employment with [redacted] he stated he was employed by EL DORADO CHEMICAL COMPANY (EDC) in Waxahachie, TX from April 1998 through late September 2000. [redacted] described his former position with EDC as a [redacted]. He advised he was hired by former EDC facility [redacted] who [redacted] stated resigned in December 1998. According to [redacted] [redacted] was replaced by [redacted] in December 1998. [redacted] according to [redacted] resigned from EDC in mid-June of 2000 and was eventually replaced by [redacted] in mid-September of 2000. From [redacted] departure through [redacted] hiring, he stated EDC [redacted] would occasionally come to the Waxahachie site to check on the company. Other than [redacted] visits, [redacted] stated he and fellow employee [redacted] were unsupervised from mid-June of 2000 through mid-September of 2000.

When asked by agents if he was aware of the missing chemicals, primarily the AMMONIUM NITRATE (AN), [redacted] replied that he was. [redacted] advised that inventory problems had existed at the site for as long as he could remember. He stated that the weigh scales were not calibrated properly and the weigh scale printer was broken. According to [redacted] with the scales being off, it was very hard to determine the exact amount of chemicals being loaded and/or mixed. [redacted] described that the weigh scales were set for 1,000 pound calibration and he was aware of the weigh scales reading at least twenty (20) pounds light during his time with EDC.

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W/ TEXT <input checked="" type="checkbox"/>
W/O TEXT _____
BY _____
DATE <u>NOV 15 2000</u>

Investigation on 10/24/2000 at Grandview, TX

266A-DL-88532-25

File # 266A-DL-88532 Date dictated 10/26/2000
by SA [redacted] MAC

300 MAC 03. 302

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Continuation of FD-302 of [redacted]

, On 10/24/2000 , Page 2

When asked by agents to describe the chemical loading process [redacted] stated that under former EDC [redacted] loading would occur first followed by customer payment. According to [redacted] this process changed after [redacted] left. [redacted] described that EDC then started obtaining customer money first, followed by the customer obtaining an invoice/blend sheet and bringing it to the EDC loader. [redacted] stated this was a problem because the customer would pay for a certain load amount and then possibly obtain more due to the scales being off. When asked by agents to speculate on the amount of chemicals missing over the last two years, [redacted] estimated that four hundred (400) tons were missing, to include AN, DI-AMMONIUM PHOSPHATE (DAP), and POTASH. [redacted] described that various chemicals were sold by EDC, to include the frequent sale of AN without additional supplements. This single AN selling was used by farmers to "top dress" their fields in preparation for planting. When asked by agents if the rumor regarding AN being missing from EDC in 1999 was true, [redacted] stated that it was. He related that chemicals were missing in early 1999 but were written off by EDC. He advised he was unsure of the amount.

When asked to describe the conditions at EDC when [redacted] was the [redacted] he stated that [redacted] was the [redacted] and that he [redacted] later heard a rumor of customers receiving loads and not paying for them. According to [redacted] performed EDC invoices, billing sheets, billing accounts, and chemical blend sheets. [redacted] stated he had the impression she did good work as the [redacted]. When asked by agents if [redacted] had performed the required monthly inventories, [redacted] advised he was unsure. [redacted] stated that both [redacted] and [redacted] departed EDC in June of 2000 after the June 2000 audit was performed by the Oklahoma City-based owner of EDC.

He further stated that the Waxahachie EDC site had been burglarized in the past and chemicals had been stolen. He was unsure of the amount stolen but stated that one (1) of the burglaries had cost him his personal tool set which was maintained at the site. [redacted] described the site as alarmed but that the alarm in the warehouse did not work correctly during his time with EDC. According to [redacted] the rumor among EDC employees was that the person committing the burglaries was a former EDC employee from the EDC site in Corsicana, TX. He stated he heard other employees talking about the person being a former chemical spreader/operator who was fired. [redacted] stated that whoever committed the break-ins knew how to operate the loader/mixer as

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 10/24/2000 , Page

3

there were chemicals found inside the loader the next morning after the break-ins.

When asked to provide an opinion on the cause(s) of the inventory problems existing at EDC, [redacted] speculated that a combination of loading/weigh scale mistakes, normal product shrinkage/attrition, and spills/leaks in the railroad unloading pit might have caused the discrepancies.

When asked by agents to describe other EDC employees who worked at the site with him, [redacted] stated that [redacted] was employed at EDC when he [redacted] joined in April 1998. He described [redacted] as quiet in his demeanor. [redacted] stated [redacted] was a very good [redacted] and possessed good working knowledge of farm related chemicals. [redacted] stated that it was his opinion that [redacted] would speak with the FBI regarding the missing chemicals. [redacted] advised that [redacted] worked at the site for about one (1) month and served as the [redacted]. He related that his [redacted] [redacted] worked as a [redacted] at the site also for about one (1) month. He also identified [redacted] as an ex-boyfriend of [redacted] as a former employee who worked at the site in 1999 for two (2) to three (3) months. According to [redacted] [redacted] was formerly the regional EDC [redacted] until his departure for CHANDLER EQUIPMENT in Chandler, TX. When asked if he had any reason to believe EDC employees were involved in stealing or "back door selling" the missing chemicals, [redacted] stated he did not.

When asked if he would be willing to discuss the reasons he, along with three (3) other employees, left the company in late-September 1999, [redacted] stated he would. He advised that himself, wife [redacted] and [redacted] were members of the CHURCH OF GOD EVANGELISTIC ASSOCIATION (COG) in Waxahachie, TX. He advised he had started going to the church after learning about the beliefs from [redacted]. According to [redacted] COG members had sighted an upcoming full moon in late-September 2000 which indicated, based upon their religious beliefs, the need for them to celebrate a "high Sabbath". When they asked for a day off to celebrate the Sabbath, [redacted] advised that EDC told them to turn their uniforms in if they did not show up for work. He advised he did not believe EDC was fair in handling their religious concerns.

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Continuation of FD-302 of [redacted]

, On 10/24/2000, Page 4

[redacted] further advised that their religious beliefs include the study of Biblical prophecies, dietary restrictions, and worship services on Saturdays rather than Sundays. He described the church, led by Cedar Hill, TX resident [redacted] as containing two-hundred (200) members. When asked by agents if attending the church was welcome to all, including agents, [redacted] replied that it was and the church already was attended by a Dallas Police Department officer by the name of [redacted] (phonetic). [redacted] advised that the church was formed in Waxahachie in 1993 and that services were held at 2:00 pm on Saturdays.

When advised by agents as to the legal ramifications of telling agents the truth, to include any knowledge of church members possessing the referenced chemicals, even for legal farm usage, [redacted] advised that he, as well the church members, were honest people who took great pride in doing the right things. [redacted] stated that he himself, as well as others in the church, would tell agents the truth regarding knowledge of the missing chemicals.

Prior to ending the conversation, [redacted] stated he was willing to speak with agents again should it be necessary.

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 10/27/2000

To: Dallas

Attn: Domestic Terrorism Squad;

SA

SA

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From: Dallas

Intelligence Unit

Contact: IRS [REDACTED]

214/922-7792

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Approved By: [REDACTED]

Drafted By: [REDACTED]

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Case ID #: 266A-DL-88532 (Pending)

Title: UNSUBS;
 143 TONS OF AMMONIUM NITRATE MISSING
 FROM EL DORADO CHEMICAL COMPANY,
 WAXAHACHIE, TEXAS;
 AOT-DT-VC

Synopsis: Report background information.

Reference: 266A-DL-88532 Serial 16

Enclosure(s): Relevant print outs from public source databases.

Details: On 10/05/2000, the North Texas Joint Terrorism Task Force (NTJTF) was contacted by the Oklahoma City Field Office regarding 143 tons of Ammonium Nitrate reported missing from the EL DORADO CHEMICAL COMPANY, Waxahachie, TX. The Oklahoma City Field Office was telephonically contacted on 10/05/2000 by [REDACTED] Legal Department, LSB INDUSTRIES, 16 South Pennsylvania, Oklahoma City, OK. LSB INDUSTRIES is the parent company of EL DORADO CHEMICAL COMPANY.

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On 10/06/2000, Dallas initiated a Full Investigation on the matter. The above referenced EC requested logical background checks and analytical aid. Oklahoma City provided the names, addresses, phone numbers, and social security numbers of six individuals who had resigned since June 2000: [REDACTED]

[REDACTED] and [REDACTED] the [REDACTED] and [REDACTED] were all identified as members of the CHURCH OF GOD in Waxahachie, TX and resigned because they were denied leave for a religious holiday.

266A-DL-88532-AG

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BY <input type="checkbox"/>
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To: Dallas From: Dallas
Re: 266A-DL-88532, 10/27/2000

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None of the individuals provided by the company had criminal histories. Driver's License and [REDACTED] information revealed the correct spelling of the [REDACTED] last name is [REDACTED]. [REDACTED] is married to [REDACTED] DOB [REDACTED]. [REDACTED] is married to [REDACTED] DOR [REDACTED]. [REDACTED] is married to [REDACTED] DOB [REDACTED]. Biographical information on the six individuals is provided below. Addresses are included if they vary from what has previously been provided by LSB INDUSTRIES.

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Descriptive Data:

Reference

Name -

Last:

First:

Middle:

Race:

Sex:

DOB:

DLN:

SOC:

VIN:

VIN:

Address(es) -

House #:

Street Name:

City:

State:

Postal Code:

Reference

Name -

Last:

First:

Middle:

Race:

Sex:

DOB:

DLN:

SOC:

Address(es) -

House #:

Street Name:

Street Suffix:

City:

State:

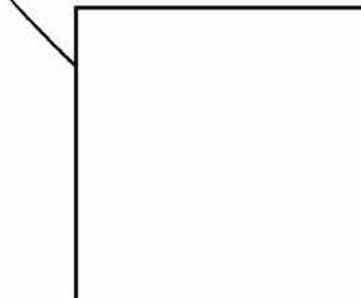
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b7C

To: Dallas From: Dallas
Re: 266A-DL-88532, 10/27/2000

Reference

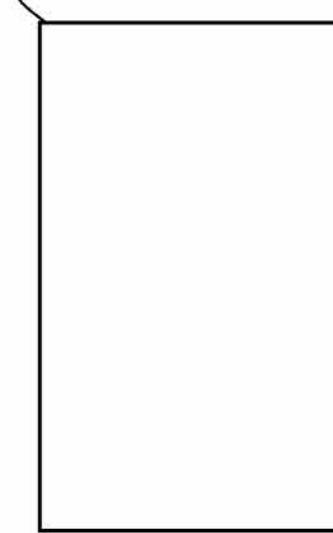
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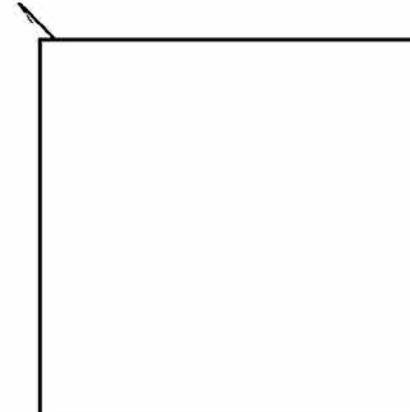
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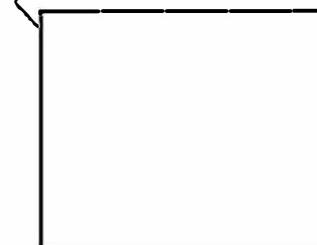
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Race:
Sex:
DOB:
DLN:
SOC:
VIN:

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Reference

Name -
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First:
Middle:
Race:
Sex:
DOB:

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To: Dallas From: Dallas
Re: 266A-DL-88532, 10/27/2000

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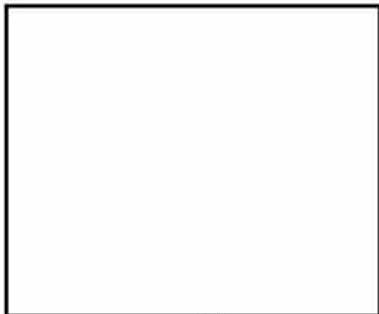
DLN:

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- 1 -

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription

11/07/2000

[redacted], white male, date of birth [redacted]
[redacted] Social Security Account Number [redacted] residing at [redacted]

[redacted] home telephone number [redacted]

[redacted] was interviewed at his residence. After being advised of the identity of the interviewing agents and the nature of the interview, he provided the following information:

[redacted] indicated he believed he was "fired" recently from a position as a [redacted] with the EL DORADO CHEMICAL COMPANY (EDCC) in Waxahachie, Texas. [redacted] was hired and began work with EDCC on January 20, 1998, due to his experience with [redacted]

[redacted] explained what he believed the reasoning behind the firing as due to his and several other employees religious beliefs. [redacted] explained EDCC [redacted] was aware from the beginning of his employment that he [redacted] would not be able to work on the Sabbath (Saturday) and other religious holidays. [redacted] stated the Feast of the Trumpets begins with the sitting of the new moon seen in Jerusalem, Israel, which usually occurs on a Saturday. As Saturday is a Sabbath for [redacted] it was never a problem; however, this year it occurred on a Friday.

[redacted] and the other employees, [redacted] and [redacted] requested the holy day off but were denied. All four individuals belong to a Church of God church on Sycamore Street in Waxahachie, Texas. According to [redacted] told the four individuals that if they did not show up to work on the Friday, then he would consider it their resignation. [redacted] indicated his religious beliefs were never a problem in the past. In fact, [redacted] stated he would work Sundays occasionally to make up on any work missed on Saturdays. According to [redacted] EDCC had a loose attendance policy allowing him to call in the morning if he was not going to show up for work.

266A-DL-88532-27

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Investigation on 11/06/2000 at Palmer, Texas

File # 266A-DL-88532

by SA
SA

Date dictated

11/07/2000

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266A-DL-88532

Continuation of FD-302 of [redacted]

, On 11/06/2000 , Page 2

[redacted] was questioned as to the location of [redacted]
residence in which [redacted] stated [redacted] lived in [redacted]
[redacted] located between Maypearl, Texas, and Itasca, Texas. [redacted]
stated [redacted] was hired in August 2000, and would not have any
information concerning the missing AN from EDCC in Waxahachie,
Texas.

[redacted] spoke of some of the problems surrounding the
inventory of bulk products at EDCC in Waxahachie, Texas. While
[redacted] was employed at EDCC, he said he did not believe the scales
were calibrated. [redacted] stated the truck scale never worked.
[redacted] did not believe the hopper scale was off too much on its'
readings stating he thought it was "pretty accurate." [redacted]
indicated the EDCC facility in Waxahachie, Texas, was seventy tons
short of AN after the June 1999 annual inventory. [redacted] was asked
what he thought happened to the seventy tons of AN in 1999 and the
one hundred forty three tons of AN in 2000. [redacted] replied he
believed at one point that the shortage could have been from a
couple of burglaries or some product dropping on the ground or
floor. [redacted] also stated the rate of shrinkage for AN was fairly
high in which it deteriorates rapidly. [redacted] did not know the
normal loss of AN per year but believed one hundred forty three
tons was a lot of AN to be missing.

[redacted] described the specific steps in loading AN while
at EDCC in Waxahachie, Texas. The loader was given a sheet with
amounts to load. The bulk product was loaded into a hopper/scale
combination which at one point had an attached printer. The
printouts were sent to the office for invoicing, but the printer
broke and was not fixed. The product was then sent to the mixer
and then dumped into a spreader buggy. [redacted] advised a farmer
would probably use two to three hundred pounds of AN per acre.
There were farmers who would reduce this amount in order to save
some money, but two to three hundred pounds of AN per acre was the
average.

[redacted] suspected most of the problems with inventory
stemmed from the management of the EDCC facility in Waxahachie,
Texas. When [redacted] was the [redacted] the spraying orders were
listed in a (work) book for [redacted] who would plan his day in
accordance with the book. After [redacted] took over as [redacted]
the office was "turned upside down." [redacted] also suspected [redacted]
of maybe spreading EDCC AN on side jobs and keeping the money, or
hand writing an invoice and keeping the cash, or some AN loads were
just not invoiced. [redacted] also bought a brand new Chevrolet

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 11/06/2000

3

Suburban in the Spring of 2000 listing for about \$23,000.00. [redacted] also towed a new looking Bass fishing boat behind the [redacted] Suburban one time [redacted] was unsure who owned the boat [redacted] explained [redacted] salary was \$24,000.00 a year. [redacted] works as a teacher in Italy, Texas. [redacted] stated he did not know any specifics about [redacted] taking cash or spreading AN but [redacted] connected him as things went bad from a managing standpoint when [redacted] took over in December 1998. [redacted] was known to re invoice seed and count empty boxes of insecticide or pesticide as full during monthly inventories.

[redacted] stated he attempted to tell [redacted] about the problems and [redacted] replied, "If you don't like your job you can go someplace else."

[redacted] also spoke of his relationship with [redacted] of the EDCC headquarters in Rockwall, Texas. [redacted] thought he got along well with [redacted] at the beginning of his employment but that changed at the end. [redacted] stated [redacted] accused [redacted] of charging lumber and gutter flashing for personal use. [redacted] stated he actually bought silicone for EDCC buildings and equipment. [redacted] also accused [redacted] of spending too much on fuel for an EDCC take home truck. [redacted] explained he went to Corsicana, Texas, a few times in August 2000 and the EDCC employees there were driving the truck. He was also told he could drive the truck like it was his own. Aside from that, [redacted] did not have any idea how the truck used so much fuel (about \$400.00 more than normal).

[redacted] was asked about the EDCC [redacted] in Waxahachie, Texas. [redacted] stated he did not know what [redacted] did while employed as the [redacted]. He also characterized [redacted] as unprofessional. The [redacted] before [redacted] was [redacted] whd [redacted] characterized as being a "good job."

[redacted] provided the following names of farmers who were unhappy with the EDCC service while [redacted]

[redacted], Mansfield/Midlothian, Texas;
[redacted], Midlothian, Texas;
[redacted], Waxahachie, Texas;
[redacted], Waxahachie, Texas.

[redacted] indicated two spreader buggies were missing from the Waxahachie, Texas plant. One was missing while [redacted] was

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 11/06/2000 , Page 4

manager and one while [redacted] was managing. No one knows where they are.

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 11/13/2000

Number (SSAN) [redacted]

born [redacted]

Social Security Account

Texas Commercial [redacted]

Drivers Licence Number

[redacted], residing at [redacted]

telephone number [redacted] was interviewed in Red Oak, TX.

After being advised of the identity of the interviewing agents and the purpose of the interview, he provided the following information:

[redacted] was employed by ELDORADO CHEMICAL COMPANY (EDC) from December 1993 through December 1998. During employment at EDC, he was the [redacted] at the Waxahachie, TX EDC site. When asked by agents if he knew EDC was missing 143 tons of AMMONIUM NITRATE (AN), [redacted] replied that he was aware of the incident through former EDC [redacted]. According to

[redacted] EDC has written off missing AN over the years, to include times during his employment period. He estimated that during his employment with EDC, the company (EDC) wrote off sixty (60) tons of POTASH and forty (40) tons of AN. He further estimated that during his five years of employment, the AN balance was off anytime between twenty (20) and sixty (60) tons. When asked about product attrition, [redacted] speculated that 3,000 tons of AN was sold yearly and that average attrition was 3% or thirty (30) - forty (40) tons per year. [redacted] advised it was normal EDC practice to conduct inventories once a year.

[redacted] described inventory accountability as a recurring problem at EDC. In his opinion, EDC never seemed too concerned about the issue. He elaborated that EDC would not fix issues which he felt were directly related to the inventory inaccuracy. [redacted] described that AN tends to shrink in density when moist or humid and that the roof of the EDC warehouse leaked when it rained. He stated that AN is measured by EDC in density and that measurements combined with wet AN would be off. [redacted] advised that the roof leaked from when he started with EDC until the spring of 1998 when EDC finally fixed the problem.

266A-DL-88532-28

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Investigation on 11/06/2000 at Red Oak, TXFile # 266A-DL-88532 Date dictated 11/13/2000by SA MTH318mac02,302

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DR

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 11/06/2000 , Page 2

He further related that the weigh scale used for weighing customer orders was not accurate. According to [redacted] CARDINAL SCALES (CS) had calibrated the weigh scale for 1,000 pounds and annually checked it for accuracy. [redacted] however, did not feel the weigh scale was accurate and it would be "off" in increasing increments the greater the size of the load. [redacted] advised that issues such as the weigh scale, leaking roof, and equipment breakages were brought to EDC's attention but action was not taken quickly to rectify the problems.

When asked by agents if he felt there were other reasons for EDC's inventory problems, he stated that EDC's second weigh scale was also broken. [redacted] advised that it (the weight scale) normally would be used to weigh empty buggies prior to loads. He further related that shipments to EDC would arrive via railroad cars. It was his belief that the shipments were sometimes inaccurate as there was no way to verify the amount of product as specified on the receiving invoices. During his time with EDC [redacted] stated he had two (2) clerks, [redacted] and [redacted]. He described the clerks as competent but believed it was possible that invoices were not always entered accurately on the computer, especially when EDC was busy with customers.

When asked by agents if he was aware of four (4) EDC employees quitting in late September, [redacted] replied that he was. He advised he had spoken to former EDC [redacted] about the situation. When asked by agents if he had any reason to suspect current or former EDC employees as involved in the missing AN, [redacted] stated he did not possess any suspicions. [redacted] described [redacted] and [redacted] as both having very strong religious faith. [redacted] advised he hired [redacted] in the spring of 1997 to run the EDC "spray rig" and hired [redacted] soon after for the "spreader truck". According to [redacted] both believed in Saturday Sabbaths and attended church together in Waxahachie, TX. [redacted] advised he was unable to recall the name of the church, but knew it was responsible for placing anti-United Nations (UN) billboards along the interstate. He further stated he had heard the church minister speak on the radio. It was his belief that neither [redacted] nor [redacted] were "off the wall" and he had no reason to suspect either one of stealing the AN. [redacted] stated he had no reason to believe either of the two (2) committed "back door dealings" with church members and did not think either [redacted] or [redacted] owned any land. [redacted] stated he did not personally know [redacted] or [redacted]. [redacted] advised that EDC routinely had a large employee turnover due to pay issues.

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Continuation of FD-302 of [redacted]

, On 11/06/2000, Page 3

Prior to ending the conversation, [redacted] stated he was amenable to speaking with agents again should it be necessary.

-1-

FEDERAL BUREAU OF INVESTIGATION

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b7CDate of transcription 11/16/2000

[redacted] date of birth
[redacted], Social Security Account Number [redacted]
residing and working from his residence located at [redacted]
[redacted] After being advised of
the identity of the interviewing agent and the nature of the
interview, he provided the following information:

[redacted] stated he conducted business with the El Dorado Chemical Company (EDCC) in Waxahachie, Texas, for years up until last year. [redacted] indicated he ordered Ammonium Nitrate (AN) to be spread by EDCC last year on five hundred acres of his best land to grow wheat. [redacted] stated it either was not done or the AN was bad as there was no effect. The Texas Department of Agriculture (TDA) conducts spot analysis checks of products, including AN, used by farmers to protect the farmers from unscrupulous vendors. TDA tested the AN or ground on [redacted] Land and ordered EDCC to apply more AN which they did but in liquid form. [redacted] changed suppliers of AN at this point and has not dealt with EDCC.

[redacted] stated he always received a bill for AN and its' application from EDCC. [redacted] indicated that if anything, he was probably billed too much instead of receiving AN without being invoiced. [redacted] knew of only one employee who worked at EDCC in Waxahachie, Texas. [redacted] stated his first name was [redacted] but he could not remember his last name.

[redacted] believed the missing AN was probably put on the ground by someone working on their own. [redacted] had no specific information but was merely speculating.

[redacted] [redacted] provided the names of [redacted] (or possibly [redacted] and [redacted] as two individuals who would know more about the management of EDCC.

Investigation on 11/15/2000 at Venus, TexasFile # 266A-DL-88532 - 29 Date dictated 11/16/2000by SA [redacted] MTT321 mjh 01.302

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(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 11/06/2000

To: Dallas

Attn: Domestic Terrorism Squad;

SA [redacted]

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b7C

From: Dallas

Intelligence Unit

Contact: IRS [redacted]

214/922-7792

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Approved By: [redacted] ✓

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Drafted By: [redacted] slb

Case ID #: 266A-DL-88532✓ (Pending)

Title: UNSUBS;
143 TONS OF AMMONIUM NITRATE MISSING
FROM EL DORADO CHEMICAL COMPANY,
WAXAHACHIE, TEXAS;
AOT-DT-VC

2314
[Signature]

Synopsis: Report background information.

Reference: 266A-DL-88532 Serial 16

Enclosure(s): Relevant print outs from public source databases.

Details: On 10/05/2000, the North Texas Joint Terrorism Task Force (NTJTTF) was contacted by the Oklahoma City Field Office regarding 143 tons of Ammonium Nitrate reported missing from the EL DORADO CHEMICAL COMPANY, Waxahachie, TX. The Oklahoma City Field Office was telephonically contacted on 10/05/2000 by [redacted]
[redacted] Legal Department, LSB INDUSTRIES, 16 South Pennsylvania, Oklahoma City, OK. LSB INDUSTRIES is the parent company of EL DORADO CHEMICAL COMPANY.

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On 10/06/2000, Dallas initiated a Full Investigation on the matter. The above referenced EC requested logical background checks and analytical aid. Oklahoma City provided the names, addresses, phone numbers, and social security numbers of six individuals who had resigned since June 2000. [redacted]
[redacted]

[redacted] and [redacted] the
[redacted] and [redacted] were all identified as members of the CHURCH OF GOD in Waxahachie, TX and resigned because they were denied leave for a religious holiday.

266A-DL-88532-30

11-27-2000

3181B01.EC.

To: Dallas From: Dallas
Re: 266A-DL-88532, 11/06/2000

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THE CHURCH OF GOD EVANGELISTIC ASSOCIATION (COG) is a church [REDACTED] The church is known to local law enforcement because of their, "Could Texas Be Occupied By United Nations Troops?" billboards. These billboards are located throughout the Dallas Ft. Worth area. (See attached print outs from a Power Point presentation prepared by the writer for the Dallas Police Department.) The COG produces NEWSWATCH MAGAZINE and maintains a website for the magazine, www.newswatchmagazine.org. The COG is end time oriented purporting that a one world government will bring about the apocalypse. Following this line of logic the COG is anti-United Nations. Additionally, the COG believes that, "The United Nations has long been sought by Marxists and Socialists who were created by an ultra-secret organizations called the Illuminati." (Newswatch Magazine, November 15, 1999; page 4.) While the COG is not directly anti-U.S. Government, they are opposed to government actions they perceive as degrading the Constitution or giving power to the United Nations. More specifically, the COG views President Clinton and his administration as being communist and degrading the Constitution. The North Texas Joint Terrorism Task Force has no current intelligence that the COG is attempting to acquire any weapons or take action, either offensive or defensive in nature, against the U.S. Government.

The COG is located at 908 Sycamore, Waxahachie, TX.

In the course of the investigation, SA [REDACTED] determined that the COG has purchased or is purchasing their property from UNIVERSITY ASSEMBLY OF GOD CHURCH [REDACTED]

[REDACTED] A check of the Ross address by SA [REDACTED] revealed that it the location of UNIVERSITY ASSEMBLY OF GOD CHURCH. [REDACTED] In addresses. The relationship between the COG and UNIVERSITY ASSEMBLY OF GOD CHURCH is currently unknown.

A search of ACS was positive for [REDACTED]

[REDACTED]. These references further revealed that [REDACTED] is the former spiritual advisor to the REPUBLIC OF TEXAS and interviewed [REDACTED] In [REDACTED] SA [REDACTED] stated that he and Waxahachie Police Chief Barrow opined that [REDACTED] had changed his name, because they were unable to locate any historical information on [REDACTED] Current [REDACTED] information on [REDACTED] goes back to 1992. If [REDACTED] did change his identity, he clearly appears comfortable in Texas and has become established in the area.

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To: Dallas From: Dallas
Re: 266A-DL-88532, 11/06/2000

Descriptive Data:

Reference

Name -

 Last:

 First:

 Middle:

Race:

Sex:

DOB:

SOC:

Address(es) -

 House #:

 Street Name:

 Street Suffix:

 City:

 State:

 Postal Code:

Address(es) -

 House #:

 City:

 State:

 Postal Code:

Address(es) -

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 City:

 State:

 Postal Code:

Address(es) -

 House #:

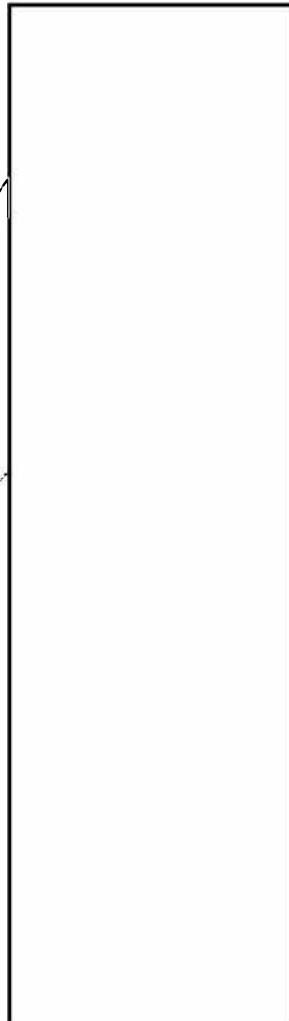
 City:

 State:

 Postal Code:

Phone #:

Phone #:



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Reference

Name -

Address(es) -

 House #:

 Street Name:

 Street Suffix:

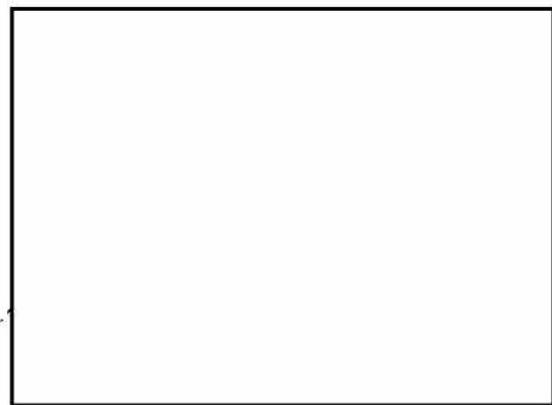
 City:

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 Postal Code:

 House #:

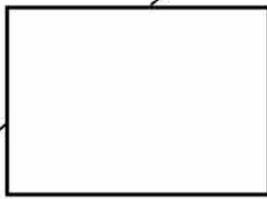
 Pre Direction:



To: Dallas From: Dallas
Re: 266A-DL-88532, 11/06/2000

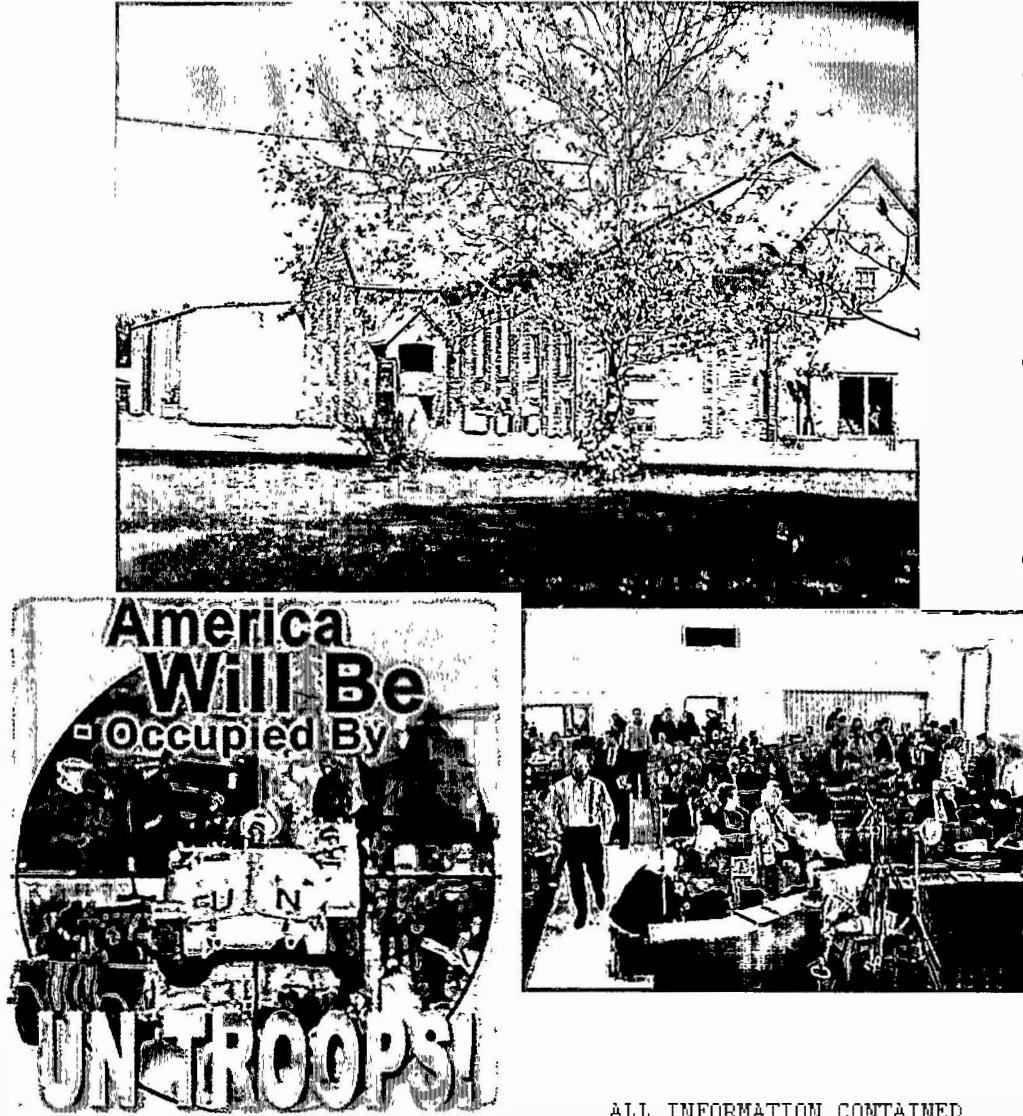
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Street Name:
Street Suffix:
City:
State:
Postal Code:



♦♦

Church of God Evangelistic Association



- Leader David J. Smith, former spiritual advisor for ROT.
- Subscribes to the New World Order philosophy.
- Advertising on billboards in the Dallas area that the UN will take over the US.
- Church visited by Larry Wayne Harris.

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 12-11-2009 BY 60324 uc baw/sab/lsg

David J. Smith

Could Texas Be Occupied By

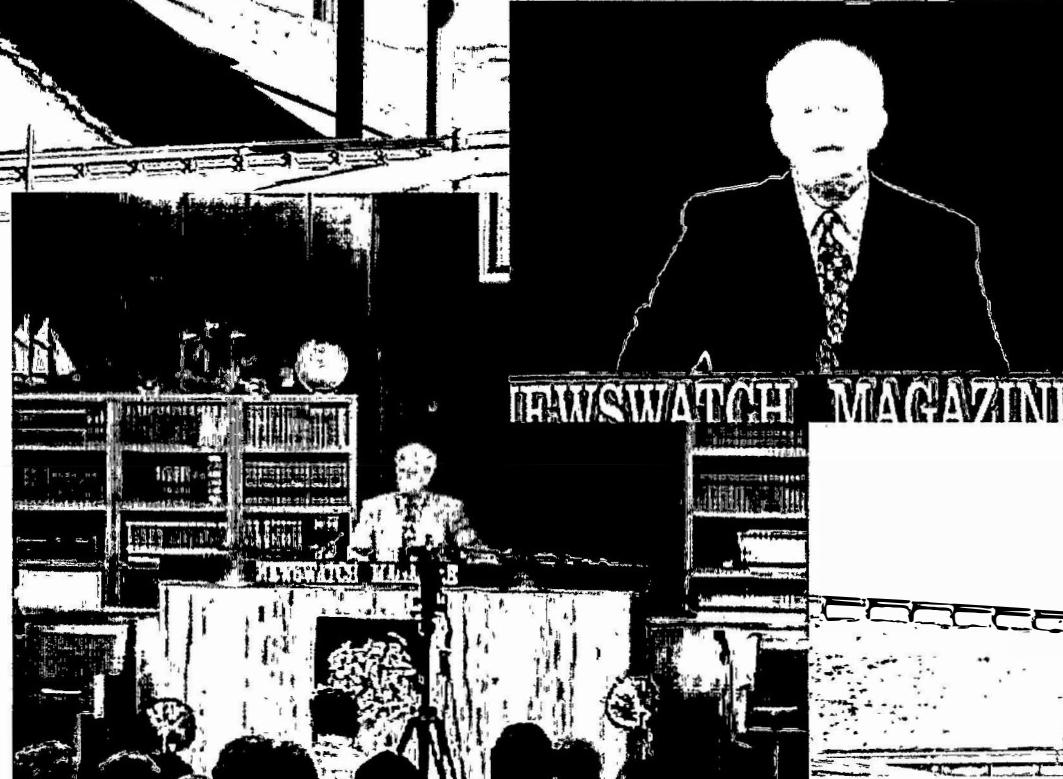


1-800-516-8736

Could the United States Be Occupied By



1-800-516-8736



- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 11/22/2000

Source, who is not in a position to testify, provided the following information:

Source stated he/she was able to provide information regarding license plates and meeting dates/times at the Cedar Hill, TX residence of [redacted]

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Source was advised by writer of the possible connection or association by [redacted] to alleged subjects of a current investigation. Source was amenable to assisting and stated he/she would contact writer in the future with appropriate information.

(X)
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266 A-DL-88532-31

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BY <u>m</u>
DATE <u>DEC 05 2000</u>

Investigation on 10/11/2000 at Dallas, TXFile # [redacted] / 266A-DL-88532 Date dictated 11/22/2000by SA [redacted] :mac MAC327mac02.302

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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE**Date:** 12/14/2000b6
b7C**To:** All Divisions**Attn:** Counterterrorism, DTOU,
SSA [redacted]**Attn:** DT Supervisors;
Joint Terrorism Task Forces**From:** DallasDomestic Terrorism
North Texas Joint Terrorism Task Force (NTJTTF)**Contact:** SA [redacted] (214) 922-7774
SA [redacted] (214) 922-7709b6
b7C**Approved By:** [redacted]**Drafted By:** [redacted] AKb6
b7C

✓**Case ID #:** 266A-DL-88532 (Pending)

Title: UNSUB(S);
143 TONS OF AMMONIUM NITRATE MISSING
FROM EL DORADO CHEMICAL COMPANY,
WAXAHACHIE, TEXAS;
AOT-DT-VC

Synopsis: To provide case summary and set leads for Dallas Division-Tyler RA, Little Rock, Oklahoma City, and all Receiving Offices.

Full Field Investigation Instituted: 10/06/2000

Reference: 266-DL-0
266-OC-0

Details: On 10/05/2000, the North Texas Joint Terrorism Task Force (NTJTTF) was contacted through EC by the Oklahoma City Field Office regarding 143 tons of AMMONIUM NITRATE (AN) reported missing from the EL DORADO CHEMICAL COMPANY (EDC), Waxahachie, TX. Based upon the amount and potential nature of the AN, the fact that four (4) EDC employees all resigned together in late-September 2000, and the allegation that the four (4) were members of a religious organization linked to anti-government extremist beliefs, the NTJTTF initiated a Full Field Investigation.

266A-DL-88532-32

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BY	_____
DATE	DEC 14 2000

To: All Divisions From: Dallas
Re: 266A-DL-88532, 12/14/2000

Investigation by the Oklahoma City and the Dallas Field Offices has determined that LSB INDUSTRIES (LSB), Oklahoma City, OK is the parent company for EDC. According to LSB employee [redacted] a July 2000 annual physical inventory at EDC revealed that approximately \$50,000.00 in inventory was missing from EDC. Included in the missing inventory was approximately 143 tons of bulk high density Ammonium Nitrate (AN). Other components of fertilizer were also discovered to be missing during the inventory.

According to [redacted] the four (4) referenced employees all resigned on 10/04/2000 over their objections to the company refusal to grant a day off for a religious celebration. [redacted] advised that the employees had requested some days off from work because of the current position of the moon. Those requests were denied based upon the short notice so the employees subsequently resigned from EDC. Information provided by [redacted] has since been corroborated by NTJTTF investigation.

Corroborated by the NTJTTF is the fact that these former EDC employees are all members of a church known as the CHURCH OF GOD EVANGELISTIC ASSOCIATION (COG) in Waxahachie, TX. COG is [redacted]. In addition to being identified by the NTJTTF as the leader of COG [redacted] publishes NEWWATCH MAGAZINE (NWM), a monthly magazine which claims to be "a magazine making clear today's news in the light of Bible prophecy". In addition to Biblical narrative, the magazine features numerous articles concerning conspiracy theories such as the alleged government cover-up of the Waco/Branch Davidian siege and the alleged United Nations/New World Order take-over of the United States.

NWM [redacted] As depicted in the NWM November 15, 1999 edition, [redacted] has placed 26 billboards in the State of Texas "to warn Texans of United Nations (UN) plans to occupy us". The billboards feature the statement, "Could Texas Be Occupied By United Nations Troops?" and a telephone number of 1-800-516-8736. Depicted on the billboards are photographs claimed by NWM to be of white UN military vehicles located in the United States.

As advertised in NWM, [redacted] also maintains an Internet website entitled www.newswatchmagazinemagazine.org. Research of referenced website reveals similar rhetoric as found in NWM, in addition to sales of conspiracy related books and videos. The Southern Poverty Law Center (SPLC) lists [redacted] COG as an active "militia/patriot group" and uncorroborated NTJTTF source information has alleged that some COG members may be involved in weekend paramilitary training.

To: All Divisions From: Dallas
Re: 266A-DL-88532, 12/14/2000

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Additional research conducted by the NTJTTF has indicated [REDACTED] to have once been an active supporter/associate of [REDACTED] REPUBLIC OF TEXAS (ROT). An ROT document, addressed to the United Nations and dated 12/18/1995, indicated what appears to be [REDACTED] signature on pages nine and thirteen.

Referenced former EDC employees who are members of COG have been identified as follows:

1. [REDACTED] Social Security Account Number (SSAN) [REDACTED] Date of Birth (DOB):
[REDACTED] home address [REDACTED]
telephone number [REDACTED]

2. [REDACTED] SSAN [REDACTED] DOB:
[REDACTED] home address [REDACTED]
telephone [REDACTED]

3. [REDACTED] SSAN [REDACTED] DOB:
[REDACTED] home address [REDACTED]
telephone number [REDACTED]

4. [REDACTED] SSAN [REDACTED] DOB:
[REDACTED] home address [REDACTED]
telephone number [REDACTED]

In addition to the above individuals, two other EDC employees resigned in June 2000. These former employees were not members of COG and have been identified as follows:

1. [REDACTED] SSAN [REDACTED] DOB:
[REDACTED] home address [REDACTED]
telephone number [REDACTED] 1. [REDACTED] was the Waxahachie, TX EDC site [REDACTED] from December 1998 through June 2000.

2. [REDACTED] SSAN [REDACTED] DOB:
[REDACTED] telephone number [REDACTED] reported to [REDACTED] and was employed as a [REDACTED] mid-1998 through June 2000, at the Waxahachie, TX EDC site.

To: All Divisions From: Dallas
Re: 266A-DL-88532, 12/14/2000

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Additionally, other current and former employees have been identified through interviews as possibly possessing knowledge of EDC inventory practices and procedures. They have been identified as follows:

1. [REDACTED] SSAN [REDACTED] DOB: [REDACTED]
[REDACTED] home address [REDACTED]
telephone number [REDACTED] was the former [REDACTED]
[REDACTED] currently is employed by [REDACTED]
for Texas.

2. [REDACTED] SSAN [REDACTED] DOB: [REDACTED]
[REDACTED] telephone number [REDACTED]
[REDACTED] as the former EDC [REDACTED] at the
Waxahachie site from 12/1993 through 12/1998.

3. [REDACTED] Texas Drivers License [REDACTED]
DOB: [REDACTED]
telephone number [REDACTED] is the current EDC [REDACTED]
[REDACTED] Rockwall, TX.

4. [REDACTED] SSAN [REDACTED] DOB: [REDACTED]
[REDACTED] telephone number [REDACTED] is currently employed as
the [REDACTED] for the EDC site in Waxahachie, TX.

5. [REDACTED] SSAN [REDACTED] DOB: [REDACTED]
[REDACTED] work telephone number [REDACTED]
[REDACTED] is currently employed as an [REDACTED]
for EDC parent company LSB Industries, Oklahoma City, OK.

6. [REDACTED] Texas Drivers License [REDACTED]
DOB: [REDACTED] telephone [REDACTED]
number [REDACTED] was recently rehired as a [REDACTED]
[REDACTED] for EDC. He previously worked for EDC part time in 1995
and from 09/1998 to 12/1998.

As of 11/30/2000, referenced individuals [REDACTED]

and [REDACTED]

[REDACTED] have all been interviewed by the NTJTF.

To: All Divisions From: Dallas
Re: 266A-DL-88532, 12/14/2000

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Additionally, interviews were conducted at the EDC Rockwall, TX corporate site with the following EDC employees:

1. [REDACTED] SSAN [REDACTED] DOB: [REDACTED] telephone number [REDACTED]
[REDACTED] is currently the EDC [REDACTED]
[REDACTED] number [REDACTED] Rockwall, TX.

2. [REDACTED] SSAN [REDACTED] DOB: [REDACTED] telephone number [REDACTED]
[REDACTED] is currently employed as an EDC [REDACTED]
[REDACTED] Rockwall, TX.

Although interviews have not corroborated that the four (4) resigning members were involved in any suspicious activity relating to the missing chemicals, interviews have identified that during a period of approximately two (2) months during the summer of 2000, two (2) of the four (4) individuals, [REDACTED] and [REDACTED] were in control of the EDC facility without daily supervision due to a June 2000 management turnover. Interview results have not given the NTJTTF any credible reason to believe that the four (4) COG members were involved in suspicious activity relating to the missing chemicals. The investigation has also not provided any credible evidence to indicate other unidentified COG members as being involved in the missing chemicals.

Interviews have determined that COG member/former EDC employee [REDACTED] was hired by EDC approximately two (2) months after the AN was discovered missing. Regardless of the fact that [REDACTED] is alleged to have limited knowledge of the situation involving the AN, agents intend to locate and interview [REDACTED]

During interviews, COG members [REDACTED] and [REDACTED] were amenable to contact with agents and described EDC as having a history of inventory accountability problems for several years. During interviews, the [REDACTED] were open and willing to discuss the religious ideology of COG, to include an invitation for agents to visit a COG service. Although [REDACTED] was not as open in sharing personal information and/or information regarding COG, he did not provide agents any reason to believe he was involved in suspicious or criminal activities. [REDACTED] alleged that EDC business practices are so inept that several farmers in the Waxahachie area have since ceased conducting business with EDC. [REDACTED] provided names of the farmers to agents and encouraged agents to speak with the farmers to corroborate his story.

To: All Divisions From: Dallas
Re: 266A-DL-88532, 12/14/2000

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[redacted] Agents subsequently interviewed former EDC customer [redacted] whose name had been provided to agents by [redacted]. [redacted] advised he was a former EDC customer and stated he had stopped doing business with EDC based upon incorrect EDC chemical spraying of his fields. [redacted] further speculated that he was probably billed too much for AN rather than receiving excess AN.

Review of EDC documents and inventory reports have corroborated the fact that the following items are currently missing or unaccounted for from the EDC facility in Waxahachie, TX:

1. 143.38 tons of Ammonium Nitrate
2. 42.26 tons of Potash
3. 5.97 tons of K-mag
4. 43.60 tons of Dap

Interviews and reviews of EDC documents and inventory reports have revealed that missing or unaccounted for chemicals from the Waxahachie, TX EDC site is not uncommon. Interviews have also indicated the belief by former EDC employees that the weigh scales were "off" and that the weigh scale printer was broken. Speculation by former employees has included estimates that the weigh scales were "off" by 100 to 200 pounds. Additionally, former employees have speculated that AN loads were not always accurately invoiced or balanced with the computer inventory system.

In May of 1999, as EDC documents reviewed by the NTJTTF have corroborated, EDC "wrote off" 73 tons of AN that was unaccounted for from a February 1999 inventory. As this 73 ton amount is not included with the reported 143 tons, EDC is in fact missing over 200 tons of AN within the past two (2) years. Prior to current NTJTTF investigation, this 73 ton incident had not been reported to authorities. During an interview with [redacted]

EDC

[redacted] was asked by agents if it was true that 73 tons of AN were "written off" in 1999. [redacted] stated he was not aware of that incident until he was asked to review a report indicating such, at which time he seemed somewhat surprised and shocked.

To: All Divisions From: Dallas
Re: 266A-DL-88532, 12/14/2000

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Interviews of current and former EDC employees has revealed various theories and speculation by individuals as to the cause and/or whereabouts of the missing AN. During interviews at the Waxahachie, TX EDC site, agents visually inspected the weigh scale and observed that the scale provided a digital read-out on an LED screen of fifty-five (55). Agents were informed by current EDC [REDACTED] that the scales were empty and that the 55 was the read-out for 55 pounds. [REDACTED] stated that the scales would sometimes provide readings even when empty due to moisture and particles of chemicals remaining in the hopper after loads. [REDACTED] stated that the scale was always off and that approximately two (2) weeks earlier, the scale had read 92 pounds when empty.

[REDACTED] demonstrated to agents that pressing a button on the scale LED would "zero out" the read-out back to correct zero. When agents asked if other EDC employees knew how to zero-out the scale LED, [REDACTED] stated that he was currently teaching the others. He advised that when he took over the EDC manager position in September 2000, he asked former employee [REDACTED] who was still employed at the time, if he knew how to zero-out the scale prior to loading. [REDACTED] advised [REDACTED] he did not. [REDACTED] speculated to agents that scales being off as demonstrated, whether reading positive when empty or light when full, would cause inventory levels over time to be "way off". [REDACTED] further stated he was unsure if former EDC [REDACTED] knew how, or had taught the employees how to zero-out the scale.

When queried by agents as to loading procedures, [REDACTED] stated the correct way to load a farmer's buggy or truck was to first weigh the empty vehicle followed by a second weigh when load was completed. [REDACTED] stated that the invoice would be generated from the differences in the weight. [REDACTED] stated that EDC cannot currently, nor could have in the past year, performed that procedure due to the second weigh scale at the site being broken. [REDACTED] advised he was going to have both weigh scales fixed and/or calibrated in order to have a check and balance loading system. [REDACTED] described, when asked by agents, that the EDC site in Waxahachie would load, on a busy day, twenty-two (22) buggies of chemicals. [REDACTED] advised that a slow day would consist of ten (10) to fifteen (15) buggies. Agents, through prior interviews, have determined that the buggies will hold approximately five (5) tons each.

The NTJTTF intends to continue the investigation in order to ascertain the whereabouts of the referenced chemicals. The NTJTTF intends to interview former employee/COG member [REDACTED] as well as referenced farmers who previously conducted business with EDC.

To: All Divisions From: Dallas
Re: 266A-DL-88532, 12/14/2000

The NTJTTF sets forth the following leads:

To: All Divisions From: Dallas
Re: 266A-DL-88532, 12/14/2000

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LEAD(s) :

Set Lead 1:

DALLAS

AT TYLER, TX

Conduct logical interview of [REDACTED]
residing at [REDACTED] cellular
telephone number [REDACTED] was a former
[REDACTED] for EDC.

Set Lead 2:

OKLAHOMA CITY

AT OKLAHOMA CITY, OK

Conduct logical interview of LSB employee
[REDACTED] LSB Industries, Oklahoma City, OK.
Of particular interest is a statement [REDACTED] telephonically made
to writer upon initiation of the investigation. [REDACTED] advised
writer that the four employees possibly sold the chemicals out of
the back door of the company in order to fund their church. As
part of the logical interview, determine the reason for
referenced statement by [REDACTED]

Set Lead 3:

LITTLE ROCK

AT EL DORADO, AR

Conduct logical investigation and interviews of EDC
employees who have knowledge of the referenced situation in
Waxahachie, Texas.

Set Lead 4:

ALL RECEIVING OFFICES

Read and clear. Provide positive information only.

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 12/11/2000

The writer conducted a search of the Internet information provider [redacted] and determined [redacted]
[redacted]

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The search also revealed [redacted] Social Security Account Number was [redacted] and his date of birth was [redacted]

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266A-DL-88532-33

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DATE	DEC 26 2000

Investigation on 12/11/2000 at Dallas, TexasFile # 266A-DL-88532 Date dictated 12/11/2000by SA [redacted]346wjlh01.302

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription

12/19/2000

Security Account Number

birth date

Social

residing at

self employed as a

[redacted] was interviewed at his residence. After being advised of the identity of the interviewing agents and the nature of the interview, he provided the following information:

[redacted] stated he no longer does business with the El Dorado Chemical Company (EDCC) in Waxahachie, Texas, since an incident in which EDCC spread Ammonium Nitrate (AN) on his fields last year. [redacted] stated the AN was "Egyptian AN" and did not "throw" as far as the AN he was used to buying. This left streaks in his fields in which some parts of the field did not receive any AN. [redacted] stated an EDCC [redacted] named [redacted] checked his fields and agreed it needed to be redone; however, to date, EDCC has taken no action. Because of the recent problems with the supply of AN, [redacted] has decided not to conduct any further business with EDCC.

[redacted] also heard from [redacted] that EDCC was missing one hundred forty three tons of AN. [redacted] believed the missing AN could be attributed to the Waxahachie facility not receiving the product and another facility being over as the AN was sent to this other facility. [redacted] advised that [redacted] was a [redacted] of the EDCC Waxahachie facility and would have knowledge of past inventory problems. [redacted] stated he thought he remembered [redacted] telling him it was common for the Waxahachie facility to be ten tons of AN short.

[redacted] was questioned about any information he had concerning a missing buggy spreader. [redacted] stated it was probably the buggy he had. EDCC delivered [redacted] a buggy full of AN about seven to eight months ago in the rain and the buggy did not have a tarp on it. The AN became lumpy and clogged the spreader. [redacted] stated he put the buggy into a barn of his and called EDCC to come and get it. After seven to eight months of waiting for EDCC to pick up the buggy [redacted] returned the buggy himself recently.

266 A-DL-88532-31

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Investigation on 12/19/2000 at Midlothian, TexasFile # 266 A-DL-88532

Date dictated

12/19/2000by SA [initials]KTH

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FEDERAL BUREAU OF INVESTIGATION**Precedence:** ROUTINE**Date:** 01/11/2001**To:** Dallas**Attn:** SA [redacted]**From:** Oklahoma City

Squad 4/JTTF

Contact: SA [redacted]

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ext. 3764

Approved By: [redacted] WET/CAS**Drafted By:** [redacted]**Case ID #:** 266A-DL-88532 ³⁵ (Pending)**Title:** UNSUB(S);
143 TONS OF AMMONIUM NITRATE MISSING
FROM EL DORADO CHEMICAL COMPANY,
WAXAHACHIE, TEXAS;
AOT-DT-VC**Synopsis:** Lead covered to interview Heidi Brown.**Reference:** 266A-DL-88532 Serial 32**Enclosures:** For Dallas, FD-302 dated 01/11/2001 reference
interview with [redacted]**Details:** [redacted] an employee of LSB Industries Legal Department, was interviewed at her place of employment concerning a statement previously made to SA [redacted] concerning the loss of 143 tons of Ammonium Nitrate. Results of the interview are recorded on the enclosed FD-302.

Oklahoma City considers this lead covered.

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- 1 -

FEDERAL BUREAU OF INVESTIGATION

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b7CDate of transcription 01/11/2001

[redacted] date of birth [redacted] refused to provide Social Security account number, work address of LSB Industries, 16 S. Pennsylvania, OKC, OK, 73107, [redacted] was advised of the identity of the interviewing agent and the purpose of the interview. [redacted] requested that [redacted] LSB Industries General Counsel, also sit in on the interview. [redacted] provided the following information:

[redacted] an employee of the Legal Department of LSB Industries who had previously been telephonically interviewed by SA [redacted] of the Dallas Division, was asked to elaborate on a statement she had made in which she advised that the four employees of the EL DORADO CHEMICAL COMPANY, Waxahachie, TX who resigned together in late September 2000 possibly sold the chemicals out of the back door of the company in order to fund their church. [redacted] advised that she had no specific information which caused her to make that statement and that it was "guesswork". [redacted] advised that LSB Industries reported the loss when it came to the Legal Department's attention, but had no specific facts about the loss.

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[redacted] was also asked if she was aware of any inventory control problems at EL DORADO CHEMICAL COMPANY to which she stated that the Legal Department at LSB Industries had "heard" there were problems, but again had no specific information concerning the problem.

Investigation on 01/11/2001 at Oklahoma City, OKFile # 266A-DL-88532 / ³⁴ Date dictated 01/11/2001by SA [redacted]

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 01/11/2001

Number (SSAN) [redacted] born [redacted], Social Security Account [redacted]
[redacted] residing at [redacted]
[redacted] no telephone number, was interviewed at his residence. After being advised of the identities of the interviewing agents and the purpose of the interview, he provided the following information:

[redacted] stated he worked for EL DORADO CHEMICAL COMPANY, Waxahachie, TX, from August 2000 through September 2000. He advised he was hired by EDC [redacted] and while employed, performed the duties of [redacted]
[redacted]", also referred to by [redacted]

When asked by agents if he was aware of the missing AMMONIUM NITRATE (AN) and the amount, he stated he had been told by other employees of the situation when he was hired. [redacted] explained to agents that other than what he had been told by fellow employees, he really had little knowledge of the circumstances involving the missing AN. [redacted] stated that the amount missing, approximately 150 tons, would be almost impossible to hide and that if it was hidden, it would be "concrete" by now. [redacted] related that AN was hygroscopic and if not stored or used properly, it would eventually absorb moisture and harden.

When asked by agents to identify who he worked with at EDC, [redacted] replied that fellow employees consisted of [redacted] and [redacted] advised that [redacted] operated the EDC [redacted] served as the EDC chemical spreader, and [redacted] served as the EDC [redacted] [redacted] stated that EDC did not have a [redacted] during his tenure until the end of September, at which time [redacted] was hired for the position.

Investigation on 01/10/2001 at Itasca, TXFile # 266A-DL-88532 - 37 Date dictated 01/11/2001by SA mac MACOllmac 01.302

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 01/10/2001, Page 2

[redacted] stated that chemical loads for customers were handled in the following manner. [redacted] would receive customer orders and provide a load order to [redacted] at which time he would weigh the load into the EDC "hopper". [redacted] advised that it was then [redacted] job to take care of the customer receipt after the load was completed. When asked by agents if he was aware of any inventory problems resulting from poor invoice management, he replied that he was not.

When asked to provide any knowledge of problems within EDC, particularly as related to the inventory, [redacted] replied that weigh scales seemed to work normally but EDC had been missing a "buggy" while he was employed. He related that during his tenure, business was a little slow and he loaded approximately four (4) buggies a week. When asked if he had any reason to suspect "back door" sales after hours or other suspicious activities possibly involving EDC employees, [redacted] stated he did not.

When asked by agents why he had left employment with EDC, [redacted] stated he was fired over a disagreement regarding a day off request for a religious observance. [redacted] advised that he, [redacted] and [redacted] attended church together in Waxahachie, TX and were let go by EDC after they did not show up for work due to a religious celebration. When asked by agents to describe the church, [redacted] stated it was the CHURCH OF GOD EVANGELISTIC ASSOCIATION (COG) and was [redacted]. [redacted] described [redacted] as a "good ol' boy" and he [redacted] had no reason to believe any COG members were responsible for the missing chemicals.

Prior to ending the interview, [redacted] advised he was currently self-employed and would contact agents if he heard any discussion involving the missing chemicals.

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE**Date:** 03/05/2001**To:** Dallas**From:** Dallas

Domestic Terrorism

North Texas Joint Terrorism Task Force (NTJTTF)

Contact: SA [redacted] (214) 922-7774b6
b7C**Approved By:** [redacted] *monks*b6
b7C**Drafted By:** [redacted] *MAC/BJ***Case ID #:** 266A-DL-88532 (Pending)**Title:** UNSUB(S);
143 TONS OF AMMONIUM NITRATE MISSING
FROM EL DORADO CHEMICAL COMPANY,
WAXAHACHIE, TEXAS;
AOT-DT-VC*(Handwritten signature)***Synopsis:** Reassignment of captioned investigation.**Details:** Effective 03/11/2001, writer is assigned to the Organized Crime Squad, Dallas Field Office. Due to reassignment status, writer requests captioned investigation be assigned to SA [redacted] FBI Dallas/NTJTTF. SA [redacted] previously was assigned as Co-Case Agent.b6
b7C

There are currently two (2) remaining leads outstanding. Both leads, respectively assigned to the Tyler Resident Agency, Dallas Division, and the El Dorado Resident Agency, Little Rock Division, involve interviews of a former EL DORADO CHEMICAL (EDC) COMPANY employee and current employees of the EDC corporate offices.

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(Handwritten notes)
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DT routine
ptx reassign
this case to
SAb6
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266-DL-88532-38

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 03/10/2001

[redacted] born [redacted], SOC [redacted]
was interviewed at his residence [redacted]. [redacted] telephone [redacted] was advised of
the identity of the interviewing agent and the purpose of the interview. He furnished the following information:

[redacted] worked for El Dorado Chemical Company (EDC) from November 1995 to October 1, 2000. [redacted] worked at the company's facility located in Tyler, Texas. He was a [redacted] for the Equipment Division until September 1998, when he wa s made [redacted] in Tyler. His [redacted] was [redacted]
[redacted] who worked at the EDC office located in Rockwall, Texas. [redacted] described his primary duty at EDC as [redacted] at the various EDC plants. [redacted] normally worked alone, but [redacted]
[redacted] stated that there were sixteen EDC plants in Texas. [redacted] and [redacted] at these plants.
[redacted] worked at LSB, the parent company for EDC, in Oklahoma City, Oklahoma.

[redacted] stated that he quit employment with EDC to own his own company. He is employed as an [redacted]

[redacted] was aware that there was a large amount of Ammonium Nitrate (AN) missing from the EDC facility located in Waxahachie, Texas. [redacted] wherein this AN was determined missing. [redacted] stated that large amounts of other components of fertilizer mix were also missing. [redacted] stated that this would indicate that AN itself was not missing, but a fertilizer mixture containing AN and other products was missing. He explained that it was his opinion that the missing product could not be used as an explosive component because when mixed with these other components the AN is no longer suitable to be used in an explosive device.

[redacted] had no reason to believe that anyone might have stolen the AN. He was aware that several employees of the Waxahachie plant were members of the Church of God. He had no

Investigation on 3/9/2001 at Chandler, Texas

File # 266A-DL-88532 Date dictated 3/10/2001

by SA [redacted] jah

266A-DL-88532

Continuation of FD-302 of [redacted]

, On 3/9/2001, Page 2

reason to suspect any members of the church of any thefts.
[redacted] stated that the company has had thefts by employees in the past, but this shortage was not caused by any of those thefts.

[redacted] believed that the missing AN was an inventory problem caused by bad management at the Waxahachie plant.
[redacted] stated that it is not that unusual for a plant to have a shortage of 20 to 30 tons of AN. A shortage of 150 tons is out of line. [redacted] explained that plant managers frequently supply extra or additional fertilizer to customers because of discrepancies or complaints in various respects concerning the receipt of, or spreading of fertilizer, to satisfy a customer. If a large quantity of fertilizer is needed to satisfy a complaining customer for whatever complaint, a plant manager should obtain authorization from his supervisors. If a plant manager knows that he has a shortage in the amount of 20 to 30 tons, he should have obtained approval for some extra distributions during the inventory period.

[redacted] stated that the Waxahachie plant stored approximately 1,000 tons of product. He believed that it had eight, 150 ton bins. The volume of product was determined during inventory by measuring the size of product in a bin and then applying a formula to the measurement. An industry standard for gain/loss during shipment/storage is 2-3% - EDC has a 1/2% standard. A semi-trailer holds 25 tons of AN. The missing AN would fill about six semi-trailers.

[redacted] described [redacted] the Waxahachie plant manager as a person that tried too hard to satisfy his customers. [redacted] believed that the shortage was "bad management" by [redacted] in inventory, billing and distribution practices. [redacted] explained that not only was fertilizer mixture missing, but seed and everything else was missing.

- 1 -

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 03/14/2001

[redacted] of [redacted]
[redacted] El Dorado Chemical Company (EDC), was contacted at his place of employment, El Dorado Chemical Company, 4500 North West Ave, El Dorado, Arkansas, telephone number [redacted]. After the interviewing agent identified himself by display of credentials and stated the purpose for the contact, [redacted] provided the following information.

[redacted] advised that he was not aware of the AN being reported missing at the Waxahachie location, nor was he aware of that location having scale problems. He added that he would not be privy to occurrences at other locations unless he happened to be informed of it during a conversation with other managers who would have had knowledge of the situation.

[redacted] volunteered that EDC-El Dorado produces approximately two hundred thousand tons of the commercial AN and two hundred thousand tons of fertilizer grade AN per year. Eighty per cent of the AN sent out travels by sealed hopper car with the rest being sent out by truck. The company also produces sulfuric acid (93/98) and strong and weak nitric acid (98/55).

[redacted] then called [redacted] and [redacted] into the office to provide any additional information. Neither [redacted] or [redacted] seemed to be aware of an EDC plant in Texas.

Both [redacted] and [redacted] concurred that EDC- El Dorado utilizes two scales in weighing AN. The scales are certified every six months.

The trucks are weighed two times, once empty and once when loaded. The hopper cars are cleaned out upon arrival and tare weighing method used, utilizing the stamped weight on the hopper car.

None of those interviewed were aware of any scale problems at EDC-El Dorado, but agreed that there could be occasions when the weight was off a little, but added that the discrepancy is always within the allowable limits.

Investigation on 3/14/01 at El Dorado, Arkansas

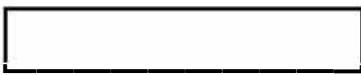
File # 266A-DL-88532-40 Date dictated 3/14/01

by SA [redacted]

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266A-DL-88532

Continuation of FD-302 of



, On 3/14/01, Page 2

When asked, there were no employees working at EDC-El Dorado who had worked at EDC-Waxahachie.

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE**Date:** 03/27/2001**To:** Counterterrorism**Attn:** Domestic Terrorism Operations
Unit (DTOU), Room 117141 b6
SSA [redacted] b7C

Dallas

From: DallasDomestic Terrorism/North Texas
Joint Terrorism Task Force (NTJTTF)
Contact: SA [redacted] (214) 922-7709b6
b7C**Approved By:** [redacted]**Drafted By:** [redacted] MNHb6
b7C**Case ID #:** 266A-DL-88532 (Closed)**Title:** UNSUB (S);
143 TONS OF AMMONIUM NITRATE MISSING
FROM EL DORADO CHEMICAL COMPANY,
WAXAHACHIE, TEXAS;
AOT-DT-VC**Synopsis:** To advise FBIHQ that captioned investigation is being closed in Dallas.**Full Field Investigation Instituted:** 10/06/2000**Details:** On 10/05/2000, the North Texas Joint Terrorism Task Force (NTJTTF) was contacted through EC by the Oklahoma City Field Office regarding 143 tons of AMMONIUM NITRATE (AN) reported missing from the EL DORADO CHEMICAL COMPANY (EDC), Waxahachie, TX. Based upon the amount and potential nature of the AN, the fact that four (4) EDC employees all resigned together in late-September 2000, and the allegation that the four (4) were members of a religious organization linked to anti-government extremist beliefs, the NTJTTF initiated a Full Field Investigation.

Investigation by the Oklahoma City and the Dallas Field Offices has determined that LSB INDUSTRIES (LSB), Oklahoma City, OK is the parent company for EDC. According to LSB employee [redacted] a July 2000 annual physical inventory at EDC revealed that approximately \$50,000.00 in inventory was missing from EDC. Included in the missing inventory was approximately 143 tons of bulk high density Ammonium Nitrate (AN). Other components of fertilizer were also discovered to be missing during the inventory.

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To: Counterterro[redacted]m From: Dallas
Re: 266A-DL-88532, 03/27/2001

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According to [redacted] the four (4) referenced employees all resigned on 10/04/2000 over their objections to the company refusal to grant a day off for a religious celebration. [redacted] advised that the employees had requested some days off from work because of the current position of the moon. Those requests were denied based upon the short notice so the employee subsequently resigned from EDC. Information provided by [redacted] has since been corroborated by NTJTTF investigation.

Corroborated by the NTJTTF is the fact that these former EDC employees are all members of a church known as the CHURCH OF GOD EVANGELISTIC ASSOCIATION (COG) in Waxahachie, TX. COG is [redacted]. In addition to being identified by the NTJTTF as [redacted] of COG, [redacted] publishes NEWSWATCH MAGAZINE (NWM), a monthly magazine which claims to be "a magazine making clear today's news in the light of Bible prophecy". In addition to Biblical narrative, the magazine features numerous articles concerning conspiracy theories such as the alleged government cover-up of the Waco/Branch Davidian siege and the alleged United Nations/New World Order take-over of the United States. However, there has been no information that [redacted] or any other COG member planned or was involved in the missing AN.

Interviews and reviews of EDC documents and inventory reports have revealed that missing or unaccounted for chemicals from the Waxahachie, TX EDC site is not uncommon. Interviews have also indicated the belief by former EDC employees that the weigh scales were "off" and that the weigh scale printer was broken. Speculation by former employees has included estimates that the weigh scales were "off" by 100 to 200 pounds. Additionally, former employees have speculated that AN loads were not always accurately invoiced or balanced with the computer inventory system.

In May of 1999, as EDC documents reviewed by the NTJTTF have corroborated, EDC "wrote off" 73 tons of AN that was unaccounted for from a February 1999 inventory. As this 73 ton amount is not included with the reported 143 tons, EDC is in fact missing over 200 tons of AN within the past two (2) years. Prior to current NTJTTF investigation, this 73 ton incident had not been reported to authorities. During an interview with [redacted] EDC [redacted]

was asked by agents if it was true that 73 tons of AN were "written off" in 1999. [redacted] stated he was not aware of that incident until he was asked to review a report indicating such, at which time he seemed somewhat surprised and shocked.

Interviews of current and former EDC employees has revealed various theories and speculation by individuals as to

To: Counterterrorism From: Dallas
Re: 266A-DL-88532, 03/27/2001

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the cause and/or whereabouts of the missing AN. During interviews at the Waxahachie, TX EDC site, agents visually inspected the weigh scale and observed that the scale provided a digital read-out on an LED screen of fifty-five (55). Agents were informed by current EDC [] that the scales were empty and that the 55 was the read-out for 55 pounds.

[] stated that the scales would sometimes provide readings even when empty due to moisture and particles of chemicals remaining in the hopper after loads. [] stated that the scale was always off and that approximately two (2) weeks earlier, the scale had read 92 pounds when empty.

[] demonstrated to agents that pressing a button on the scale LED would "zero out" the read-out back to correct zero. When agents asked if other EDC employees knew how to zero-out the scale LED, [] stated that he was currently teaching the others. He advised that when he took over the EDC manager position in September 2000, he asked former employee [] (one of those who resigned on 10/04/2000), who was still employed at the time, if he knew how to zero-out the scale prior to loading. [] advised [] he did not. [] speculated to agents that scales being off as demonstrated, whether reading positive when empty or light when full, would cause inventory levels over time to be "way off". [] further stated he was unsure if former EDC [] knew how, or had taught the employees how to zero-out the scale.

When queried by agents as to loading procedures [] stated the correct way to load a farmer's buggy or truck was to first weigh the empty vehicle followed by a second weigh when load was completed. [] stated that the invoice would be generated from the differences in the weight. [] stated that EDC cannot currently, nor could have in the past year, performed that procedure due to the second weigh scale at the site being broken. [] advised he was going to have both weigh scales fixed and/or calibrated in order to have a check and balance loading system. [] escribed, when asked by agents, that the EDC site in Waxahachie would load, on a busy day, twenty-two (22) buggies of chemicals. [] dvised that a slow day would consist of ten (10) to fifteen (15) buggies. Agents, through prior interviews, have determined that the buggies will hold approximately five (5) tons each.

All logical interviews have been completed and the missing AN appears to be a management/inventory problem. It is therefore respectfully requested this investigation be closed.

To: Counterterro~~orism~~ From: Dallas
Re: 266A-DL-88532, 03/27/2001

LEAD(s) :

Set Lead 1: (Adm)

COUNTERTERRORISM

AT WASHINGTON, DC

Read and clear.

♦♦

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 03/15/2001

To: Dallas

Attn: Domestic Terrorism
North Texas Joint Terrorism
Task Force (NTJTF)
SA [redacted]
SA [redacted]b6
b7C

From: Little Rock

Squad 7 / El Dorado RA

Contact: SA [redacted]

(870) 863-3466

b6
b7C

Approved By: [redacted]

Drafted By: [redacted]

b6
b7C

Case ID #: 266A-DL-88532-41 (Pending)

Title: UNSUB(S) ;
143 TONS OF AMMONIUM NITRATE MISSING
FROM EL DORADO CHEMICAL COMPANY,
WAXAHACHIE, TEXAS
AOT-DT-VC

Synopsis: Lead covered.

Reference: 266A-DL-88532 Serial 32

Enclosure(s): Enclosed for Dallas is the original and two (2) copies of the FD-302 reflecting the interview with officials at El Dorado Chemical Company, El Dorado, Arkansas. Also enclosed is the 1-A envelope containing interview notes.

Details: In referenced serial, Little Rock, El Dorado RA was set forth a lead to contact employees at El Dorado Chemical Company located in El Dorado, Arkansas to ascertain whether any of them had information pertaining to the situation at the El Dorado Chemical Company location in Waxahachie, Texas.

On 3/14/2001, contact was made with the [redacted]
[redacted] as well as the [redacted] and the [redacted]
[redacted] at the El Dorado, Arkansas location.

Although the [redacted] seemed aware of the existence of the Waxahachie location, [redacted] and [redacted] did not. None of the officials were aware of the missing AN at the Waxahachie location or of the

INDEXED _____
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FBI - DALLAS

To: Dailas From: Little Rock
Re: 266A-DL-88532, 03/15/2001

scale problems. They agreed that there could be occasions when the weight would be off a little.

There are no employees working at EDC-El Dorado who had worked at EDC-Waxahachie.

Based on the above, Little Rock considers this lead covered.

LEAD(s):

Set Lead 1:

DALLAS

AT DALLAS, TEXAS

1. Read and clear.

♦♦

FEDERAL BUREAU OF INVESTIGATION

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b7C**Precedence:** ROUTINE**Date:** 04/19/2002**To:** Little Rock**From:** Little Rock

Squad 7, Hot Springs RA

Contact: SA [redacted] [redacted]

b2

Approved By: [redacted]**Drafted By:** [redacted] maj**Case ID #:** 249A-LR-41039 (Pending)**Title:** [redacted] [redacted]EL DORADO CHEMICAL COMPANY;
ENVIRONMENTAL CRIMES - CLEAN WATER ACT**Synopsis:** Initiate investigation.

Details: For information, in January, 2002, writer was contacted by SA [redacted] Environmental Protection Agency (EPA), Houston, Texas, who is a member of the Arkansas Environmental Crimes Task Force. During this contact, SA [redacted] advised that the EPA had received information from the Arkansas Department of Environmental Quality (ADEQ) indicating that El Dorado Chemical Company (EDCC), El Dorado, Arkansas had experienced a significant chemical discharge, and had failed to make proper notifications to ADEQ. The chemical spill was the result of a broken valve in a chemical holding pond. Before when attempts were made to repair the leaking valve, the decision was made by Environmental Managers [redacted] and [redacted] and approved by [redacted] to drain the contents of the pond into a feeder stream of Haynes Creek, which feeds into the Ouachita River.

This spill occurred over a period from September 21, 2001 through October 9, 2001, and resulted in the release of in excess of 7193 pounds per day of ammonia and 10,990 pounds per day of nitrates.

SA [redacted] requested assistance in conducting interviews of the Environmental Managers and [redacted] however, due to prior commitments, writer was unable to assist in this matter, and SA [redacted] assisted in place of writer. Based on collected evidence and the statements of the captioned subjects,

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FBI - LITTLE ROCK	

249A-LR-41039

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b7CContinuation of FD-302 of EL DORADO CHEMICAL, On 7/9/2003, Page 2

engineers. However, he was told by the engineers that the discharge could not be stopped and that a tap valve could not be placed because of the pressure.

[redacted] said that contributing to the discharge was the method in which Monsanto constructed the pipeline in the 1970s using a 24 inch pipe down to a 12 inch. Also, dissimilar metals were utilized in the construction.

[redacted] said that in monitoring the discharge, samples were taken and sent off for analysis and the nearby creek was checked. The creek was already, "out of the banks" and no dead fish were observed. He pointed out that a two week "turnaround" for lab reports is not uncommon. A DMR non-compliance report was sent out as they had exceeded their discharge permit. [redacted] said that he had a report which indicated that no toxicity was caused by the discharge.



U.S. Department of Justice

Tom Gean
United States Attorney
Western District of Arkansas

Sixth & Rogers Room 216
Post Office Box 1524
Fort Smith, AR 72902

(501) 783-5125
FAX: (501) 785-2442

April 4, 2002

[Redacted]
El Dorado Chemical Company
P. O. Box 231
El Dorado, AR 71731

b6
b7C

RE: United States v. [Redacted]

Dear [Redacted]

This office has received an investigative report from the EPA, Criminal Investigation Division, which indicates that you have been involved in violations of the Clean Water Act. We have reviewed this report and have determined that there is sufficient evidence to warrant the initiation of criminal charges against you.

Ordinarily, this office would proceed by presenting the evidence to a Federal Grand Jury, and would ask that body to return an Indictment against you. If an Indictment were returned, you would then be required to appear in court pursuant to an arrest warrant or summons.

In an attempt to expedite proceedings, we are writing to advise you as to the status of this matter and to suggest that you retain an attorney to represent you. If you are unable to afford an attorney, you may contact **Becky Kaldem, Courtroom Deputy for U. S. Magistrate Judge Bobby E. Shepherd, (870) 863-3173**, and ask for the appointment of an attorney. After you have obtained an attorney, we request that your attorney contact the undersigned to discuss disposition of this case.

We will forego proceeding with this matter until the close of business April 19, 2002. If we have not been contacted by your attorney before that date, we will proceed to present this matter to a Grand Jury as soon as possible thereafter.

Sincerely yours,

Tom Gean
United States Attorney

By: *Mark W. Webb*
Mark W. Webb
Assistant U.S. Attorney

cc: Becky Kaldem



U.S. Department of Justice

Tom Gean
United States Attorney
Western District of Arkansas

Sixth & Rogers Room 216
Post Office Box 1524
Fort Smith, AR 72902

(501) 783-5125
FAX: (501) 785-2442

April 4, 2002

[Redacted]
b6
b7C

El Dorado Chemical Company
P. O. Box 231
El Dorado, AR 71731

RE: United States v. [Redacted]

Dear [Redacted]

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Sincerely yours,

Tom Gean
United States Attorney

By: *Mark W. Webb*
Mark W. Webb
Assistant U.S. Attorney

cc: Becky Kaldem



U.S. Department of Justice

Tom Gean
United States Attorney
Western District of Arkansas

Sixth & Rogers Room 216
Post Office Box 1524
Fort Smith, AR 72902

(501) 783-5125
FAX: (501) 785-2442

April 4, 2002



El Dorado Chemical Company
P. O. Box 231
El Dorado, AR 71731

b6
b7C

RE: United States v. El Dorado Chemical Company

Dear [redacted]

This office has received an investigative report from the EPA, Criminal Investigation Division, which indicates that El Dorado Chemical Company has been involved in violations of the Clean Water Act. We have reviewed this report and have determined that there is sufficient evidence to warrant the initiation of criminal charges against El Dorado Chemical Company.

Ordinarily, this office would proceed by presenting the evidence to a Federal Grand Jury, and would ask that body to return an Indictment against El Dorado Chemical Company. If an Indictment were returned, a company representative would then be required to appear in court pursuant to a summons.

In an attempt to expedite proceedings, we are writing to advise you as to the status of this matter and to suggest that El Dorado Chemical Company retain an attorney to represent it.

We will forego proceeding with this matter until the close of business April 19, 2002. If we have not been contacted by your attorney before that date, we will proceed to present this matter to a Grand Jury as soon as possible thereafter.

Sincerely yours,

Tom Gean
United States Attorney

By: *Mark W. Webb*
Mark W. Webb
Assistant U.S. Attorney

- 1 -

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 04/19/2002

On April 11, 2002, a package was received via U.S. Postal Service from Special Agent [REDACTED] Environmental Protection Agency (EPA), Houston, Texas. This package contained documents reflecting investigation to date regarding EL DORADO CHEMICAL COMPANY, El Dorado, Arkansas. Copies of this documentation are attached to this report.

Investigation on 4/12/2002 at Hot Springs, Arkansas
File # 249A-LR-41039  Date dictated 4/19/2002
by SA [REDACTED]  maj

- 1 -

FEDERAL BUREAU OF INVESTIGATION

b6
b7CDate of transcription 04/19/2002

On April 11, 2002, a package was received via U.S. Postal Service from Special Agent [REDACTED] Environmental Protection Agency (EPA), Houston, Texas. This package contained documents reflecting investigation to date regarding EL DORADO CHEMICAL COMPANY, El Dorado, Arkansas. Copies of this documentation are attached to this report.

(A)
maj

Investigation on 4/12/2002 at Hot Springs, Arkansas
File # 249A-LR-41039 - 2 Date dictated 4/19/2002
by SA [REDACTED] maj

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FBI - LITTLE ROCK	

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(Indicate page, name of newspaper, city and state.)

Pg 1A

(Mount Clipping in Space Below)

Haz mat team called in to help upright acid-laden rail cars

By JANICE MCINTYRE
City Editor

Hazardous material workers from three large southern cities - Dallas, Houston and Memphis, Tenn. - gathered at railroad tracks just north of El Dorado Monday to begin the arduous task of uprighting three toppled train cars loaded with nitric acid.

Six El Dorado Chemical railroad cars overturned Saturday morning in a wooded area north of El Dorado off North West Avenue.

Early Monday afternoon, Randall Whitmore, responsible care manager for El Dorado Chemical, said haz mat response team workers with Hulcher Environmental Services arrived in El Dorado to coordinate clean-up efforts.

He said hazardous material workers - the same ones that coordinated last year's cleanup when an El Dorado-Wesson train derailed at Lion Oil - were expected to complete the undertaking late Monday afternoon.

Whitmore said of the six cars that derailed Saturday, the two closest to North West Avenue were empty and the third car from the highway contained ammonium nitrate pellets. The

pellets were unloaded from the rail car Saturday and the train was placed back on its wheels.

The other three derailed cars were full of nitric acid, and Whitmore explained those cars would not be unloaded before being uprighted by Hulcher contract workers.

At 1 p.m. Monday, Hulcher workers had managed to upright the first nitric acid-filled tanker and by 3:30 p.m., all three train cars had been uprighted without incident.

Whitmore explained that each tanker car was loaded with 100 tons of nitric acid, a chemical used for various products including computer chip manufacturing.

Ammonium nitrate is a fertilizer that is mixed with other elements such as potash, and used to enrich farm lands in this area, Whitmore explained.

He said the accident occurred when one of the empty, lighter cars jumped the track in a curve, causing the nitric acid cars to uncouple and topple off the tracks.

The derailment occurred on railroad tracks located on El Dorado Chemical Plant property and Whitmore said the com-

See TRAIN, Page 3A

El Dorado News-Times
Date: El Dorado, Arkansas
Edition: 4/16/02

b6
b7C

Title

El Dorado Chemical Co;

Character:
or
Classification: 249A-LR-41039
Submitting Office:
Little Rock

Indexing:

SEARCHED	INDEXED
SERIALIZED	FILED
JUN 11 2002	
FBI - LITTLE ROCK	
JP	

10102

249A-LR-41039-3

FBI/DOJ

Train

Continued from Page 1A

pany owns two and leases four of the cars involved in the incident.

According to Whitmore, empty train cars involved in the derailment were shipped out to be inspected and will eventually be returned to service.

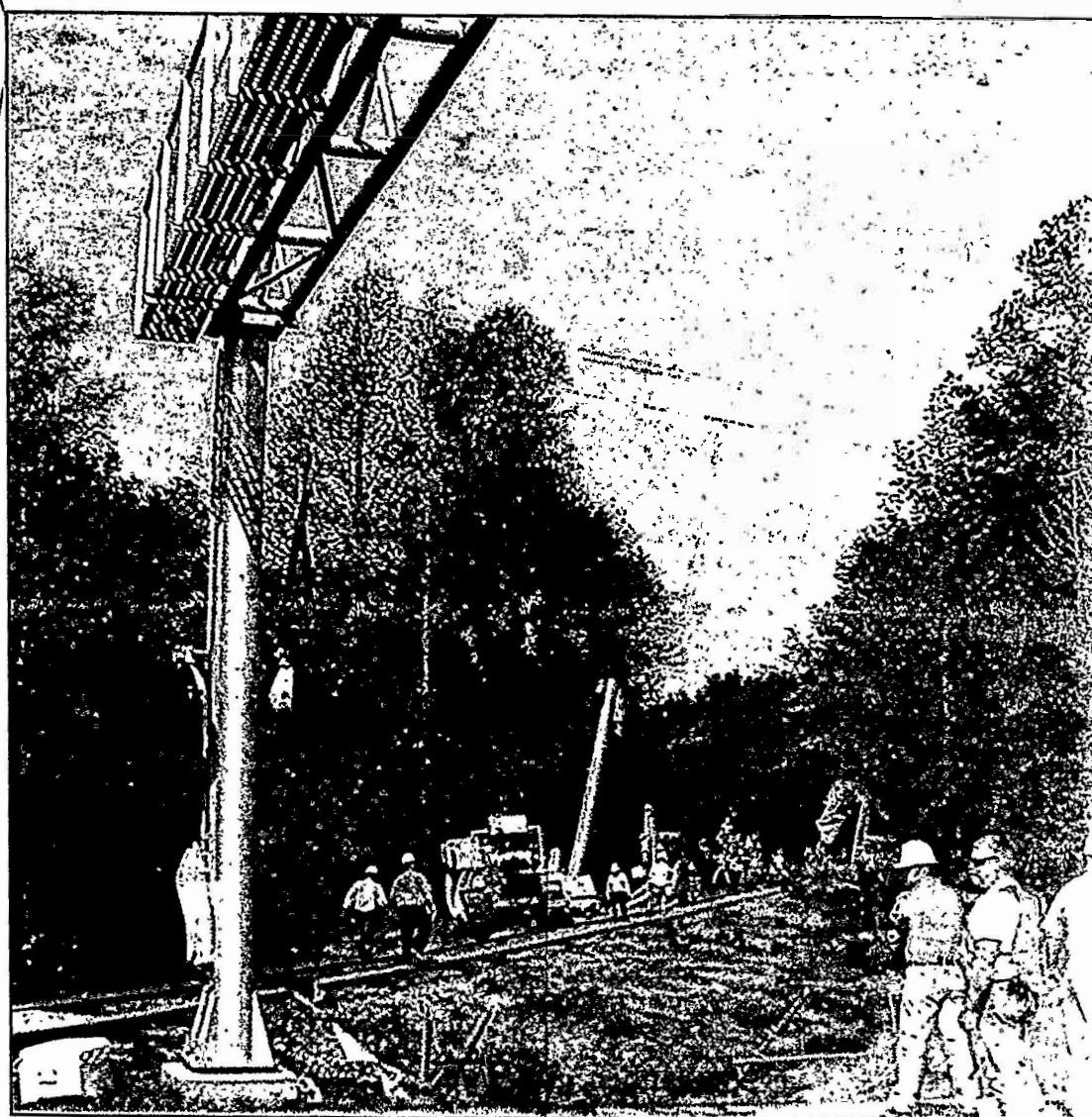
As the nitric acid cars are uprighted, Whitmore said they will be pulled back into the plant, where they will be offloaded and repaired.

He said the tanker cars are constructed of heavy solid aluminum and were not badly

damaged as a result of the accident, but brakes and handrails will need repairs. "They are capable of taking a licking," he said.

In addition to haz mat and rail crew workers at the derailment site, Whitmore said officials with the Arkansas Department of Environmental Quality, Environmental Protection Agency, El Dorado Fire Department and Union County Office of Emergency Services, all assisted in the clean-up operations.

No injuries were reported as a result of the derailment or clean-up.



Cleaning up the mess

Hazardous material workers with Hulcher Environmental Services of Houston, Dallas and Memphis, Tenn., work to clear the train tracks where railroad cars containing nitric acid over-

turned. Six El Dorado railcars lay just north of El Dorado Avenue.

FEDERAL BUREAU OF INVESTIGATION

b6
b7C

Precedence: ROUTINE

Date: 10/04/2002

To: Little Rock

From: Little Rock
Squad 7, Hot Springs RA
Contact: SA [redacted] [redacted]

b2

Approved By: [redacted]

Drafted By: [redacted] maj

Case ID #: 249A-LR-41039 (Pending)

Title: [redacted]

EL DORADO CHEMICAL COMPANY;
ENVIRONMENTAL CRIMES - CLEAN WATER ACT

Synopsis: Status.

Details: For information, this matter was discussed with AUSA Mark Webb, Western District of Arkansas, on October 4, 2002. AUSA Webb advised that the subject company, El Dorado Chemical, has retained former United States Attorney P.K. Holmes to represent both the company and the managers individually. AUSA Webb advised that he had been in contact with Holmes and they plan to meet to discuss the matter in the near future. AUSA Webb indicated he will update writer once that meeting has taken place.

JW

♦♦

277MAJ04.EC

249A-16-41039-4

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE**Date:** 01/22/2003b6
b7c**To:** Little Rock**From:** Little Rock
Squad 7, Hot Springs RA
Contact: SA [redacted]

b2

Approved By: [redacted]**Drafted By:** [redacted] naj**Case ID #:** 249A-LR-41039 (Pending)**Title:** [redacted]EL DORADO CHEMICAL COMPANY;
ENVIRONMENTAL CRIMES - CLEAN WATER ACT**Synopsis:** Status.

Details: For information, this matter was discussed with AUSA Mark Webb, Western District of Arkansas, on January 23, 2003. AUSA Webb advised that the subject company, El Dorado Chemical, has retained former United States Attorney P.K. Holmes to represent both the company and the managers individually. AUSA Webb advised that he had been in contact with Holmes and they are close to working out a settlement; however, jury trials have prevented them from working out the final details. AUSA Webb advised that he anticipates that the matter will be resolved in the near future, and at that time he will update writer.

♦♦

023 MAJOL, EC

SEARCHED _____	INDEXED _____
SERIALIZED _____	FILED _____
JAN 27 2003	
FBI - LITTLE ROCK	
d	

249A-LR-41037-5

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE**Date:** 05/21/2003b6
b7c**To:** Little Rock**From:** Little Rock

Squad 7, Hot Springs, AR

Contact: SA [redacted]

b2

Approved By: [redacted]**Drafted By:** [redacted]:maj**Case ID #:** 249A-LR-41039 (Pending)**Title:** [redacted]EL DORADO CHEMICAL COMPANY;
ENVIRONMENTAL CRIMES - CLEAN WATER ACT**Synopsis:** Status update.

Details: For information, this matter was discussed with AUSA Mark Webb, Western District of Arkansas, on May 21, 2003. AUSA Webb advised that the subject company, El Dorado Chemical, has retained former United States Attorney P.K. Holmes to represent both the company and the managers individually. AUSA Webb advised that he had been in contact with Holmes and they are negotiating a plea agreement for the El Dorado Chemical Company as a corporation, and then they will negotiate pleas for subjects [redacted]. AUSA Webb advised that the plea for the corporation should be finalized within the next month. He advised that the corporation will most likely plead guilty to a misdemeanor charge of negligent discharge. He will advise when an agreement is reached and a plea entered, and the file will be updated accordingly.

*(A
maz)*

♦♦

M1 MAY 01, 2003

911A-1P-1105-1-6

SEARCHED	INDEXED
SERIALIZED	FILED
MAY 22 2003	
FBI — LITTLE ROCK	

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE**Date:** 07/15/2003**To:** Little Rock**From:** Little Rock

Squad 7, Hot Springs RA

Contact: SA [redacted]

b2

Approved By: [redacted]

Drafted By: [redacted] maj

Case ID #: 249A-LR-41039 (Pending)

Title: [redacted]

EL DORADO CHEMICAL COMPANY;
ENVIRONMENTAL CRIMES - CLEAN WATER ACT**Synopsis:** Status update.

Details: For information, this matter was discussed with AUSA Mark Webb, Western District of Arkansas, on July 15, 2003. AUSA Webb advised that he met with subject [redacted] and his attorney on 7/9/2003 in El Dorado [also attended by SA [redacted]]. During that meeting, [redacted] accepted full responsibility for the reporting actions that were taken in relation to the unlawful discharge, and related to AUSA Webb that he had been instructed to file the report as he did by staff of the Arkansas Department of Environmental Quality.

After meeting with [redacted] and his attorney, AUSA Webb advised that he has not made a full decision as to the prosecutive merits of this matter, but at this point, he feels that the best measure may be to offer [redacted] a Pre-trial Diversion, and charge the company with misdemeanor negligent discharge. AUSA Webb advised that he intends to speak with counsel of ADEQ before making a final decision, and he will advise of that decision, and the file will be updated at that time.

♦♦
Re-classified
249 MAJ EC
10/21/03

196MAJ 02, EC 11/15/03

Placed [redacted]
P* [redacted]
DP [redacted]

149-100-011-201-7

SEARCHED _____	INDEXED _____
SERIALIZED _____	FILED _____
JUL 16 2003	
FBI — LITTLE ROCK	

[Signature]

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE**Date:** 12/16/2003b6
b7c**To:** Little Rock**From:** Little Rock
Squad 7, Hot Springs RA
Contact: SA [redacted] [redacted]

b2

Approved By: [redacted]**Drafted By:** [redacted] maj**Case ID #:** 249A-LR-41039 (Pending Inactive)**Title:** [redacted]EL DORADO CHEMICAL COMPANY;
ENVIRONMENTAL CRIMES - CLEAN WATER ACT**Synopsis:** Request closure.

Details: For information, this matter was discussed with AUSA Mark Webb, Western District of Arkansas, on 12/16/2003. AUSA Webb advised that upon his review of the complete circumstances of the matter, he felt the most prudent course of action was to offer the defendants Pre-trial diversion. He discussed the matter with FAUSA Cromwell, and he concurred, as does writer. However, when AUSA Webb contacted EPA-CID in New Orleans, it became clear to him that EPA-CID was not satisfied with his proposal and met with USA Tom Gean. It was determined that the only avenue to resolve the matter was to refer it to DOJ-Environmental Section. The matter has now been referred to [redacted] DOJ. .

(X)
Mj

As all parties in the Western District of Arkansas agree that this matter was best handled in the way originally planned, writer has invested very little time in the investigation, and the original EPA investigator is no longer involved in the case, it is respectfully suggested that this matter be closed administratively, and if further pursued, by EPA-CID alone.

♦♦

350 MAJ04, cc



RECEIVED _____ INDEXED _____
SERIALIZED _____ FILED _____

DEC 17 2003

FBI - LITTLE ROCK



U.S. Department of Justice

Federal Bureau of Investigation

b6
b7C

In Reply, Please Refer to
File No.

Little Rock, Arkansas 72211
December 24, 2003

[Redacted]
EL DORADO CHEMICAL COMPANY,
EL DORADO, ARKANSAS;
ENVIRONMENTAL CRIMES

As background, in January 2002, the Hot Springs Resident Agency was contacted by SA [redacted] Environmental Protection Agency (EPA), Houston, Texas, who is a member of the Arkansas Environmental Crimes Task Force. During this contact, SA [redacted] advised that the EPA had received information from the Arkansas Department of Environmental Quality (ADEQ) indicating that El Dorado Chemical Company (EDCC), El Dorado, Arkansas had experienced a significant chemical discharge, and had failed to make proper notifications to ADEQ. The chemical spill was the result of a broken valve in a chemical holding pond. Before attempts were made to repair the leaking valve, the decision was made by Environmental Managers [redacted] and [redacted] and approved by [redacted] to drain the contents of the pond into a stream o [redacted] aynes Creek, which feeds into the Ouachita River.

This spill occurred over a period from September 21, 2001 through October 9, 2001, and resulted in the release of in excess of 7193 pounds per day of ammonia and 10,990 pounds per day of nitrates.

SA [redacted] requested assistance in conducting interviews of the Environmental Managers and [redacted] and these interviews were conducted. Based on collected evidence and the statements of the captioned subjects, AUSA Mark Webb, Western District of Arkansas, issued target letters to [redacted] and to [redacted] on behalf of EDCC.

AUSA Webb then negotiated with El Dorado Chemical and was prepared to allow the corporation to plead to misdemeanor charges and civil penalties and/or the individual employees submit to pre-trial diversion. It is noted that the FBI Case [redacted] (X)

Agent concurred with AUSA Webb's assessment of the case and supported his plea offer. However, on 12/16/2003, AUSA Webb advised that he had been in contact with EPA-CID, and when he explained his negotiated offer, EPA-CID was not pleased with his decision. In an effort to please all parties, USAO, Western District of Arkansas has referred the matter to the Environmental Crimes Section, U.S. Department of Justice for potential prosecution.

As all investigative measures have been taken and the FBI is no longer involved in the resolution of the matter, FBI, Little Rock Division is closing this investigation.

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE**Date:** 12/24/2003**To:** Criminal Investigative **Attn:** Environmental Crimes Unit**From:** Little Rock

Squad 7, Hot Springs RA

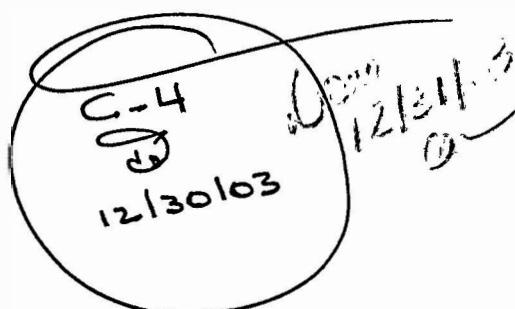
Contact: SA [redacted]

b2

Approved By: [redacted]**Drafted By:** [redacted]:maj**Case ID #:** 249A-LR-41039 (Closed)**Title:** [redacted]EL DORADO CHEMICAL COMPANY;
ENVIRONMENTAL CRIMES - CLEAN WATER ACT**Synopsis:** Advise case being closed.**Enclosure(s):** Enclosed are two copies of an LHM summarizing this matter and setting forth the reason for closure.**Details:** Captioned matter is being closed by Little Rock Division as outlined in enclosed LHM.

♦♦

358 MAJ 02. EC



DEC 3 2003

FBI — LITTLE ROCK

249-LR-41037-10

Accomplishment involves:
(check all that apply)

- Drugs
 A Fugitive
 Bankruptcy Fraud
 Computer Fraud/Abuse
 Corruption of Public Officials
 Money Laundering
 Sub Invest Asst by FO (s)

Asst. FO(s) A, B, C, D

Task Force

Assisting Agencies x

1. EPA

2.

Name:

A. Complaint / Information / Indictment

- Federal Local International

Complaint Date: _____

Check if Civil Rico Complaint

Information Date: 11/19/2005

Indictment Date: _____

B. Locate/Arrest

- Federal Local International

Subject Priority: A B C

Locate Date: _____

Arrest Date: _____

 Subject Resisted Arrest Subject Arrested was Armed

C. Summons Date: _____

- Federal Local

D. Recovery/Restitution/PELP X

- Federal Local International

Recovery Date: _____

Code # Amount \$ _____Code # Amount \$ _____

Restitution Date: _____

 Court Ordered Pretrial DiversionCode # Amount \$ _____

PELP Date: _____

Code # Amount \$ _____

E. Hostage(s) Released Date: _____

Released by: Terrorist Other

Number of Hostages: _____

Child Located Date: _____

N. Subject Information (Required for all Sections excluding Section D (Recovery/PELP), Section E (Hostage), Section I, and Section L).

Name	Race •	Sex	Date of Birth	Social Security No. (if available)
El Dorado Chemical Company				

For Indictments/Convictions only:

- Subject related to an LCN, Asian Organized Crime (AOC), Italian Organized Crime (IOC), Russian/Eastern European, Caribbean, or Nigerian Organized Crime Group - Complete FD-515a, Side 1 Blocks A-E mandatory, F-H as appropriate.
- Subject related to an OC/Drug Organization, a VCMO Program National Gang Strategy target group, or a VCMO Program National Priority Initiative target group - Complete FD-515a, Side 1 Blocks A-C only.

x Additional information may be added by attaching another form or a plain sheet of paper for additional entries.

• See codes on reverse side.

✓ Requires that an explanation be attached and loaded into ISRAA for recovery over \$1m and PELP over \$5m.

Serial No. of FD-515

11

Investigative Assistance or Technique Used							
Rate	FO	IAT	Rate	FO	IAT	Rate	FO
		Fin. Analyst			Lab. Div. Exam		
		Aircraft Asst.			Lab. Field Sup		
		Computer			Pen Registers		
		Consen Mon.			Photo Cover.		
		Elsur / FISC			Polygraph		
		Elsur / T. III			Search Warrant		
		Eng. Field Spt.			Show Money		
		Eng. Tape Ex			SOG Asst.		
		Legals Asst.			Swat Team		
		Evid Purchase			Tech. Ag/Equip.		
		Inf/CW Info			Phone Toll Rec		

J. Civil Rico Matters Date: _____

Also Complete "Section G"

Other Civil Matters Date: _____

Judgment _____

Judicial Outcome _____

Amount \$ _____

Suspension: Years _____ Months _____

K. Administrative Sanction Date: _____

Subject Description Code _____

Type: Length:

 Suspension Permanent Debarment or Injunction Year _____ Months _____

L. Asset Seizure Date: _____

Asset Forfeiture Date: _____

CATS # Mandatory _____

Check one of the three:

 Asset Forfeiture - Administrative Asset Forfeiture - Civil Judicial Asset Forfeiture - Criminal

Do not indicate \$ value in Section D

M. Acquittal / Dismissal / Pretrial Diversion

Acquittal Date: _____

Dismissal Date: _____

Pretrial Diversion Date: _____

02/07/2005

b6
b7C

02/07/05 12:13:13

***** INFORMATION *****
SENSITIVE / UNCLASSIFIEDCase Number: 249-LR-41039
Serial No.: 11Stat Agent Name
Stat Agent SOC.Report Date: 02/01/2005
Accom Date.: 11/19/2004

Does Accomplishment Involve	Assisting Joint Agencies	Assisting Agents SOC	Subject Name
Drugs : N	EPA		EL DORADO CHEMICAL COMPAN
A Fugitive. : N			
Bankruptcy Fraud. : N			
Computer Fraud/Abuse. : N			RA Squad Task Force
Corruption of Public Officials: N			HSG 7
Money Laundering. : N			

Sub. Invest. Asst by Other FOs:

1 = Used, but did not help
 2 = Helped, Minimally
 3 = Helped, Substantially
 4 = Absolutely Essential

Investigative Assistance or Technique Used	FINAN ANALYST	LAB DIV EXAMS	UCO-GROUP I	FT. MON-NRCSC
	AIRCRAFT ASST	LAB FIELD SUP	UCO-GROUP II	FOR LANG ASST
	COMPUTER ASST	PEN REGISTERS	UCO-OTHER	NON FBI LAB EX
	CONSEN MONITR	PHOTO COVERGE	NCAVC/VI-CAP	VICT-WITN COOR
	ELSUR/FISC	POLYGRAPH	CRIM/NS INTEL	IO WANTED FLYR
	ELSUR/III	SRCH WAR EXEC	CRIS NEG-FED	SARS
	ENG FIELD SUP	SHOW MONEY	CRIS NEG-LOC	CART
	ENG TAPE EXAM	SOG ASST	ERT ASST	ASSET FORF PRO
	LEGATS ASST.	SWAT TEAM	BUTTE-ITC	FORF SUPPORT P
	EVIDNCE PURCH	TECH AG/EQUIP	SAVANNAH-ITC	
	INFORMANT/CW	TEL TOLL RECS	POC-WRCSC	

Information is for Federal, Local, or International (F/L/I)....: F
Serial Number of Information.....:

United States Code Violation

Title	Section	Counts
33	1319C	1

Accomplishment Narrative

THE DELAY IN REPORTING THIS CONVICTION IS DUE TO THE LATE NOTIFICATION BY THE USAO, AS THE MATTER WAS RE-ASSIGNED FROM AUSA WEBB TO AUSA SMITH, AND AUSA SMITH WAS NOT AWARE AS TO WRITER'S INVOLVEMENT IN THE MATTER

SENSITIVE / UNCLASSIFIED

02/07/2005

***** CONVICTION *****
SENSITIVE / UNCLASSIFIED

b6
b7CCase Number: 249-LR-41039
Serial No.: 11Stat Agent Name:
Stat Agent SOC: [REDACTED]Report Date: 02/01/2005
Accom Date.: 11/19/2004

Does Accomplishment Involve	Assisting Joint Agencies	Assisting Agents SOC	Subject Name
Drugs : N	EPA		EL DORADO CHEMICAL COMPAN
A Fugitive. : N			
Bankruptcy Fraud. : N			
Computer Fraud/Abuse. : N			
Corruption of Public Officials: N			
Money Laundering. : N			

Sub. Invest. Asst by Other FOs:

1 = Used, but did not help
 2 = Helped, Minimally
 3 = Helped, Substantially
 4 = Absolutely Essential

Investigative Assistance or Technique Used	-----	-----	-----
FINAN ANALYST	LAB DIV EXAMS	UCO-GROUP I	FT. MON-NRCSC
AIRCRAFT ASST	LAB FIELD SUP	UCO-GROUP II	FOR LANG ASST
COMPUTER ASST	PEN REGISTERS	UCO-OTHER	NON FBI LAB EX
CONSEN MONITR	PHOTO COVERAGE	NCAVC/VI-CAP	VICT-WITN COOR
ELSUR/FISC	POLYGRAPH	CRIM/NS INTEL	IO WANTED FLYR
ELSUR/III	SRCH WAR EXEC	CRIS NEG-FED	SARS
ENG FIELD SUP	SHOW MONEY	CRIS NEG-LOC	CART
ENG TAPE EXAM	SOG ASST	ERT ASST	ASSET FORF PRO
LEGATS ASST.	SWAT TEAM	BUTTE-ITC	FORF SUPPORT P
EVIDNCE PURCH	TECH AG/EQUIP	SAVANNAH-ITC	
INFORMANT/CW	TEL TOLL RECS	POC-WRCSC	

Date of Conviction (MM/DD/YYYY) : 11/19/2004
Subject Description Code. : 8BFederal, Local, or International (F/L/I) : F
Felony or Misdemeanor (F/M) : MPlea or Trial (P/T) : P
Judicial State. : AR
Judicial District : WDA

U. S. Code Violation(s)			Form FD-515a: Subject's Role =
Title	Section	Counts	
33	1319C	1	

Accomplishment Narrative

THE DELAY IN REPORTING THIS CONVICTION IS DUE TO THE LATE NOTIFICATION BY THE USAO, AS THE MATTER WAS RE-ASSIGNED FROM AUSA WEBB TO AUSA SMITH, AND AUSA SMITH WAS NOT AWARE AS TO WRITER'S INVOLVEMENT IN THE MATTER

SENSITIVE / UNCLASSIFIED

Accomplishment involves:
(check all that apply)

- Drugs
 A Fugitive
 Bankruptcy Fraud
 Computer Fraud/Abuse
 Corruption of Public Officials
 Money Laundering
 Sub Invest Asst by FO (s)

Asst. FO(s) A, B, C, D

Task Force

Assisting Agencies x •
1. EPA

2.

A. Complaint / Information / Indictment

 Federal Local International

Complaint Date: _____

Check if Civil Rico Complaint

Information Date: 11/19/2004

Indictment Date: _____

B. Locate/ Arrest

 Federal Local InternationalSubject Priority: A B C

Locate Date: _____

Arrest Date: _____

 Subject Resisted Arrest Subject Arrested was Armed

C. Summons Date: _____

 Federal Local

D. Recovery/Restitution/PELP X

 Federal Local International

Recovery Date: _____

Code • Amount \$ _____Code • Amount \$ _____

Restitution Date: _____

 Court Ordered Pretrial DiversionCode • Amount \$ _____

PELP Date: _____

Code • Amount \$ _____

E. Hostage(s) Released Date: _____

Released by: Terrorist Other

Number of Hostages: _____

Child Located Date: _____

N. Subject Information (Required for all Sections excluding Section D (Recovery/PELP), Section E (Hostage), Section I, and Section L).

For _____

 Subject related to an LCN, Asian Organized Crime (AOC), Italian Organized Crime (IOC), Russian/Eastern European, Caribbean, or Nigerian Organized Crime Group - Complete FD-515a, Side 1 Blocks A-E mandatory, F-H as appropriate. Subject related to an OC/Drug Organization, a VCMO Program National Gang Strategy target group, or a VCMO Program National Priority Initiative target group - Complete FD-515a, Side 1 Blocks A-C only.

- Additional information may be added by attaching another form or a plain sheet of paper for additional entries.
 See codes on reverse side.

 Requires that an explanation be attached and loaded into ISRAA for recovery over \$1m and PELP over \$5m.

Investigative Assistance or Technique Used								
Rate	FO	IAT	Rate	FO	IAT	Rate	FO	IAT
		Fin. Analyst			Lab. Div. Exam			UCO - Group I
		Aircraft Asst.			Lab. Field Sup			UCO - Group II
		Computer			Pen Registers			UCO - Nat. Back
		Consen Mon.			Photo Cover.			NCAVC / VI - CAP
		Elsur / FISC			Polygraph			Crim/NS Intel Asst
		Elsur / T. III			Search Warrant			Crisis Neg. - Fed.
		Eng. Field Spt.			Show Money			Crisis Neg. - Local
		Eng. Tape Ex			SOG Asst.			ERT Asst.
		Legats Asst.			Swat Team			Butte - ITC
		Evid Purchase			Tech. Ag/Equip.			Sav - ITC
		Inf/CW Info			Phone Toll Rec			Poc - ITC

F. Conviction

 Federal Local International

Conviction Date: 11/19/2004

Subject Description Code: 8A • () •

For 6F, G, H-Include Agency Code

 Felony or Misdemeanor Plea or Trial

State: AR Judicial District: WESTERN

G. U.S. Code Violation

Required for sections A,B,F, and J
(Federal Only)

Title 33 Section 1319(c) # Counts 1

H. Sentence Date: _____

Sentence Type: _____

In Jail: Years _____ Months _____

Suspended: Years _____ Months _____

Probation: Years _____ Months _____

Fines: \$ _____

I. Disruption/Dismantlement:

Disruption Date: _____

Dismantlement Date: _____

Completion of FD-515a Side 2 Mandatory

J. Civil Rico Matters Date: _____

Also Complete "Section G"

Other Civil Matters Date: _____

Judgment _____

Judicial Outcome _____

Amount \$ _____

Suspension: Years _____ Months _____

K. Administrative Sanction Date: _____

Subject Description Code _____

Type: Length:

 Suspension Permanent Debarment or Injunction Year _____ Months _____

L. Asset Seizure Date: _____

Asset Forfeiture Date: _____

CATS # Mandatory _____

Check one of the three:

 Asset Forfeiture - Administrative Asset Forfeiture - Civil Judicial Asset Forfeiture - Criminal

Do not indicate \$ value in Section D

M. Acquittal / Dismissal / Pretrial Diversion

Acquittal Date: _____

Dismissal Date: _____

Pretrial Diversion Date: _____

b6
b7C

Serial No. of FD-515

12

02/07/2005

***** INFORMATION *****
SENSITIVE / UNCLASSIFIED

b6
b7CCase Number: 249-LR-41039
Serial No.: 12Stat Agent Name: [REDACTED]
Stat Agent SOC.: [REDACTED]Report Date: 02/01/2005
Accom Date.: 11/19/2004

Does Accomplishment Involve	Assisting Joint Agencies	Assisting Agents SOC	Subject Name
Drugs : N A Fugitive. : N Bankruptcy Fraud. : N Computer Fraud/Abuse. : N Corruption of Public Officials: N Money Laundering. : N	EPA		[REDACTED]

RA	Squad	Task Force
HSG	7	

Sub. Invest. Asst by Other FOs:

1 = Used, but did not help
2 = Helped, Minimally
3 = Helped, Substantially
4 = Absolutely Essential

Investigative Assistance or Technique Used			
FINAN ANALYST	LAB DIV EXAMS	UCO-GROUP I	FT. MON-NRCSC
AIRCRAFT ASST	LAB FIELD SUP	UCO-GROUP II	FOR LANG ASST
COMPUTER ASST	PEN REGISTERS	UCO-OTHER	NON FBI LAB EX
CONSEN MONITR	PHOTO COVERAGE	NCAVC/VI-CAP	VICT-WITN COOR
ELSUR/FISC	POLYGRAPH	CRIM/NS INTEL	IO WANTED FLYR
ELSUR/III	SRCH WAR EXEC	CRIS NEG-FED	SARS
ENG FIELD SUP	SHOW MONEY	CRIS NEG-LOC	CART
ENG TAPE EXAM	SOG ASST	ERT ASST	ASSET FORF PRO
LEGATS ASST.	SWAT TEAM	BUTTE-ITC	FORF SUPPORT P
EVIDNCE PURCH	TECH AG/EQUIP	SAVANNAH-ITC	
INFORMANT/CW	TEL TOLL RECS	POC-WRCSC	

Information is for Federal, Local, or International (F/L/I)....: F
Serial Number of Information.....:

United States Code Violation

Title	Section	Counts
33	1319C	1

Accomplishment Narrative

THE DELAY IN REPORTING THIS CONVICTION IS DUE TO THE LATE NOTIFICATION BY THE USAO, AS THE MATTER WAS RE-ASSIGNED FROM AUSA WEBB TO AUSA SMITH, AND AUSA SMITH WAS NOT AWARE AS TO WRITER'S INVOLVEMENT IN THE MATTER

SENSITIVE / UNCLASSIFIED

02/07/2005

***** CONVICTION *****
SENSITIVE / UNCLASSIFIED

b6
b7C

Case Number: 249-LR-41039
Serial No.: 12

Stat Agent Name: [REDACTED]
Stat Agent SOC.: [REDACTED]

Report Date: 02/01/2005
Accom Date.: 11/19/2004

Does Accomplishment Involve

Drugs : N
A Fugitive. : N
Bankruptcy Fraud. : N
Computer Fraud/Abuse. : N
Corruption of Public Officials: N
Money Laundering. : N

Assisting Joint Agencies

EPA

Assisting Agents SOC

Subject Name

[REDACTED]
RA Squad Task Force

HSG 7

Sub. Invest. Asst by Other FOs:

1 = Used, but did not help
2 = Helped, Minimally
3 = Helped, Substantially
4 = Absolutely Essential

FINAN ANALYST	LAB DIV EXAMS	UCO-GROUP I	FT. MON-NRCSC
AIRCRAFT ASST	LAB FIELD SUP	UCO-GROUP II	FOR LANG ASST
COMPUTER ASST	PEN REGISTERS	UCO-OTHER	NON FBI LAB EX
CONSEN MONITR	PHOTO COVERGE	NCAVC/VI-CAP	VICT-WITN COOR
ELSUR/FISC	POLYGRAPH	CRIM/NS INTEL	IO WANTED FLYR
ELSUR/III	SRCH WAR EXEC	CRIS NEG-FED	SARS
ENG FIELD SUP	SHOW MONEY	CRIS NEG-LOC	CART
ENG TAPE EXAM	SOG ASST	ERT ASST	ASSET FORF PRO
LEGATS ASST.	SWAT TEAM	BUTTE-ITC	FORF SUPPORT P
EVIDNCE PURCH	TECH AG/EQUIP	SAVANNAH-ITC	
INFORMANT/CW	TEL TOLL RECS	POC-WRCSC	

Date of Conviction (MM/DD/YYYY) : 11/19/2004
Subject Description Code. : 8A

Federal, Local, or International (F/L/I) : F
Felony or Misdemeanor (F/M) : M

Plea or Trial (P/T) : P
Judicial State. : AR
Judicial District : WDA

U. S. Code Violation(s)

Title Section Counts

Form FD-515a:
Subject's Role =

Accomplishment Narrative

SENSITIVE / UNCLASSIFIED

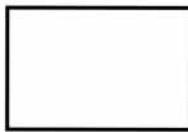
249-LR-41039



I believe this is in closed
files, could you attach this
to the back of serial 12?

b6
b7c

Thanks,



(This replaces the current attachment)

03/10/2005

***** CONVICTION *****
SENSITIVE / UNCLASSIFIED

Case Number: 249-LR-41039
Serial No.: 12

Stat Agent Name
Stat Agent SOC.

Report Date: 02/01/2005
Accom Date.: 11/19/2004

b6
b7C

Does Accomplishment Involve

Drugs : N
A Fugitive. : N
Bankruptcy Fraud. : N
Computer Fraud/Abuse. : N
Corruption of Public Officials: N
Money Laundering. : N

Assisting Joint Agencies

EPA

Assisting Agents SOC

Subject Name

RA Squad Task Force

HSG 7

Sub. Invest. Asst by Other FOs:

1 = Used, but did not help
2 = Helped, Minimally
3 = Helped, Substantially
4 = Absolutely Essential

FINAN ANALYST	LAB DIV EXAMS	UCO-GROUP I	FT. MON-NRCSC
AIRCRAFT ASST	LAB FIELD SUP	UCO-GROUP II	FOR LANG ASST
COMPUTER ASST	PEN REGISTERS	UCO-OTHER	NON FBI LAB EX
CONSEN MONITR	PHOTO COVERGE	NCAVC/VI-CAP	VICT-WITN COOR
ELSUR/FISC	POLYGRAPH	CRIM/NS INTEL	IO WANTED FLYR
ELSUR/III	SRCH WAR EXEC	CRIS NEG-FED	SARS
ENG FIELD SUP	SHOW MONEY	CRIS NEG-LOC	CART
ENG TAPE EXAM	SOG ASST	ERT ASST	ASSET FORF PRO
LEGATS ASST.	SWAT TEAM	BUTTE-ITC	FORF SUPPORT P
EVIDNCE PURCH	TECH AG/EQUIP	SAVANNAH-ITC	
INFORMANT/CW	TEL TOLL RECS	POC-WRCSC	

Date of Conviction (MM/DD/YYYY) : 11/19/2004
Subject Description Code. : 8A

Federal, Local, or International (F/L/I) : F
Felony or Misdemeanor (F/M) : M

Plea or Trial (P/T) : P
Judicial State. : AR
Judicial District : WDA

U. S. Code Violation(s)

Title	Section	Counts	Form FD-515a: Subject's Role =
13	3319C	1	

Accomplishment Narrative

THE DELAY IN REPORTING THIS CONVICTION IS DUE TO THE LATE NOTIFICATION BY THE USAO, AS THE MATTER WAS RE-ASSIGNED FROM AUSA WEBB TO AUSA SMITH, AND AUSA SMITH WAS NOT AWARE AS TO WRITER'S INVOLVEMENT IN THE MATTER

SENSITIVE / UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION**Precedence:** ROUTINE**Date:** 01/24/2005**To:** Little Rock**From:** Little Rock

Squad 7, Hot Springs RA

Contact: SA [redacted] [redacted]

b2

Approved By: [redacted]**Drafted By:** [redacted] maj**Case ID #:** 249A-LR-41039 (Pending)**Title:** [redacted]EL DORADO CHEMICAL COMPANY;
ENVIRONMENTAL CRIMES - CLEAN WATER ACT**Synopsis:** Request case be re-opened.

Details: For information, writer was advised by the United States Attorney's Office, Western District of Arkansas, that this matter had been resolved by the actions of the Department of Justice - Environmental Division. Subject Randall Whitmore, Environmental Manager, El Dorado Chemical Company, El Dorado, Arkansas plead guilty to an information charging him with one count of violation of Title 33, USC Section 1319(c) (1) (A) (failure to report an unlawful discharge). El Dorado Chemical Company itself entered a plea of guilty to an information charging violation as well to Title 33, USC Section 1319(c) (1) (A). A sentencing for both these charges is scheduled for February 16, 2005 at 9:00am in Federal District Court, El Dorado, Arkansas.



Attached are copies of the filed informations and sentencing notices. The file will be updated upon sentencing and closed on another LHM to FBIHQ.

The delay in reporting this conviction is due to the late notification by the United States Attorney's office, as the matter was re-assigned from AUSA Mark Webb to AUSA Charlie Smith, and AUSA Smith was not aware as to writer's involvement in the matter.

♦♦

024 MAJ01.EC

ECB [redacted] 1126105

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 26 2005	
FBI - LITTLE ROCK	

B3

U. S. DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS,
EL DORADO

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
EL DORADO DIVISION

NOV 19 2004

WILLIAM R. JOHNSON, CLERK

UNITED STATES OF AMERICA)

v.)

EL DORADO CHEMICAL COMPANY)

No. 1:04 m 1023

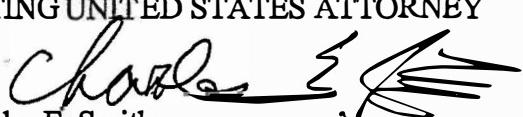
INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

On or about the 9th day of September, 2001, in the Western District of Arkansas, El Dorado Chemical Company, the defendant, did negligently violate a permit condition contained in a permit issued by the State of Arkansas under 33 U.S.C. § 1342(a), in accordance with 33 U.S.C. § 1251(b), the permit condition, NPDES permit Part II, Section D, Paragraph 6, in that the defendant failed to report to the Arkansas Department of Environmental Quality an equipment malfunction resulting in a discharge of a pollutant, to wit: suspended solids in excess of the permit limitation, into Haynes Creek, a tributary of the Ouachita River, within 24 hours from the time the defendant became aware of the circumstances.

In violation of Title 33, United States Code, Section 1319(c)(1)(A).

WILLIAM M. CROMWELL
ACTING UNITED STATES ATTORNEY

By: 
Charles E. Smith
Assistant United States Attorney
AR Bar No. 77126
P. O. Box 1524
Ft. Smith, AR 72902
479-783-5125
Noreen McCarthy
Trial Attorney

U. S. DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FILED

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
EL DORADO DIVISION

JAN 13 2005

CHRIS R. JOHNSON, CLERK
B. Kalden
DEPUTY CLERK

BY

UNITED STATES OF AMERICA

PLAINTIFF

v.

Case No.: 1:04m1023-01

EL DORADO CHEMICAL COMPANY

DEFENDANT

NOTICE

Type of Case: Criminal

TAKE NOTICE that a proceeding in this case has been re-set for the place, date and time set forth below:

Place: U.S. Post Office & Courthouse
101 South Jackson
El Dorado, AR 71730

Date and Time: **February 16, 2005 @ 9:00 a.m.**

Type of Proceeding: **SENTENCING**

DATE: January 13, 2005

HONORABLE BOBBY E. SHEPHERD
UNITED STATES MAGISTRATE JUDGE

BY: *Bobby E. Shepherd*
Courtroom Deputy

TO: P.K. Holmes, Esq.
Charles E. Smith, AUSA
Norene McCarthy, Trial Attorney, U.S. Dept. of Justice
U.S. Probation Service
U.S. Marshal's Service
Hon. Bobby E. Shepherd, U.S. Magistrate Judge

RECEIVED
2005 JAN 18 A 10:35
US ATTORNEY'S OFFICE
FCCAT SMITH, AR

NOV 19 2004

Lorraine R. JOHNSON, CLERK

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
EL DORADO DIVISION

UNITED STATES OF AMERICA)

v.)

RANDALL WHITMORE)

No. 1:04cr1022

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

On or about the 9th day of September, 2001, in the Western District of Arkansas, Randall Whitmore, the defendant, did negligently violate a permit condition contained in a permit issued by the State of Arkansas under 33 U.S.C. § 1342(a), in accordance with 33 U.S.C. § 1251(b), the permit condition, NPDES permit Part II, Section D, Paragraph 6, in that the defendant failed to report to the Arkansas Department of Environmental Quality an equipment malfunction resulting in a discharge of a pollutant, to wit: suspended solids in excess of the permit limitation, into Haynes Creek, a tributary of the Ouachita River, within 24 hours from the time the defendant became aware of the circumstances.

In violation of Title 33, United States Code, Section 1319(c)(1)(A).

WILLIAM M. CROMWELL
ACTING UNITED STATES ATTORNEY

By: 

Charles E. Smith

Assistant United States Attorney

AR Bar No. 77126

P. O. Box 1524

Ft. Smith, AR 72902

479-783-5125

Noreen McCarthy

Trial Attorney

U. S. DISTRICT COURT
WESTERN DISTRICT ARKANSAS
FILED

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
EL DORADO DIVISION

RECEIVED

JAN 13 2005

2005 JAN 18 BY A 10:35

CHRIS R. JOHNSON, CLERK
B. Kolden
DEPUTY CLERK

UNITED STATES OF AMERICA

US ATTORNEY'S OFFICE
FORT SMITH, AR

PLAINTIFF

v.

Case No.: 1:04m1022-01

RANDALL WHITMORE

DEFENDANT

NOTICE

Type of Case: Criminal

TAKE NOTICE that a proceeding in this case has been re-set for the place, date and time set forth below:

Place: U.S. Post Office & Courthouse
101 South Jackson
El Dorado, AR 71730

Date and Time: February 16, 2005 @ 9:00 a.m.

Type of Proceeding: SENTENCING

DATE: January 13, 2005

HONORABLE BOBBY E. SHEPHERD
UNITED STATES MAGISTRATE JUDGE

BY: *Bobby E. Shepherd*
Courtroom Deputy

TO: Eugene D. Bramblett, Esq.
Charles E. Smith, AUSA
Norene McCarthy, Trial Attorney, U.S. Dept. of Justice
U.S. Probation Service
U.S. Marshal's Service
Hon. Bobby E. Shepherd, U.S. Magistrate Judge

Accomplishment involves:
(check all that apply)

- Drugs
 A Fugitive
 Bankruptcy Fraud
 Computer Fraud/Abuse
 Corruption of Public Officials
 Money Laundering
 Sub Invest Asst by FO (s)

Asst. FO(s) A, B, C, D

Task Force

Assisting Agencies x*
1. EPA

2.

A. Complaint / Information / Indictment
 Federal Local International
 Complaint Date: _____
 Check if Civil Rico Complaint
 Information Date: _____
 Indictment Date: _____

B. Locate/ Arrest
 Federal Local International
 Subject Priority: A B C
 Locate Date: _____
 Arrest Date: _____
 Subject Resisted Arrest
 Subject Arrested was Armed

C. Summons Date: _____
 Federal Local

D. Recovery/Restitution/PELP X
 Federal Local International
 Recovery Date: _____
 Code * _____ ✓ Amount \$ _____
 Code * _____ ✓ Amount \$ _____
 Restitution Date: _____
 Court Ordered Pretrial Diversion
 Code * _____ ✓ Amount \$ _____
 PELP Date: _____
 Code * _____ ✓ Amount \$ _____

E. Hostage(s) Released Date: _____
 Released by: Terrorist Other
 Number of Hostages: _____
 Child Located Date: _____

N. Subject Information (Required for all Sections excluding Section D (Recovery/PELP), Section E (Hostage), Section I, and Section L).

Name	Race •	Sex	Date of Birth	Social Security No. (if available)
EL DORADO CHEMICAL COMPANY				

For Indictments/Convictions only:

- Subject related to an LCN, Asian Organized Crime (AOC), Italian Organized Crime (IOC), Russian/Eastern European, Caribbean, or Nigerian Organized Crime Group - Complete FD-515a, Side 1 Blocks A-E mandatory, F-H as appropriate.
 Subject related to an OC/Drug Organization, a VCMO Program National Gang Strategy target group, or a VCMO Program National Priority Initiative target group - Complete FD-515a, Side 1 Blocks A-C only.

- * Additional Information may be added by attaching another form or a plain sheet of paper for additional entries.
 • See codes on reverse side.
 ✓ Requires that an explanation be attached and loaded into ISRAA for recovery over \$1m and PELP over \$5m.

Serial No. of FD-515

14

Investigative Assistance or Technique Used								
Rate	FO	IAT	Rate	FO	IAT	Rate	FO	IAT
		Fin. Analyst			Lab. Div. Exam			UCO - Group I
		Aircraft Asst.			Lab. Field Sup			UCO - Group II
		Computer			Pen Registers			UCO - Nat. Back
		Consen Mon.			Photo Cover.			NCAVC / VI - CAP
		Elsur / FISC			Polygraph			Crim/NS Intel Asst
		Elsur / T. III			Search Warrant			Crisis Neg. - Fed.
		Eng. Field Spt.			Show Money			Crisis Neg. - Local
		Eng. Tape Ex			SOG Asst.			ERT Asst.
		Legats Asst.			Swat Team			Butte - ITC
		Evd Purchase			Tech. Ag/Equip.			Sav - ITC
		Inf/CW Info			Phone Toll Rec			Poc - ITC

F. Conviction
 Federal Local International
 Conviction Date: _____
 Subject Description Code: _____ •(_____)•
 For 6F, G, H-Include Agency Code
 Felony or Misdemeanor
 Plea or Trial
 State: _____ Judicial District: _____

G. U.S. Code Violation
 Required for sections A,B,F, and J
 (Federal Only)
 Title Section # Counts
 _____ _____ _____
 _____ _____ _____
 _____ _____ _____

H. Sentence Date: 2/16/2005
 Sentence Type: PB
 In Jail: Years _____ Months _____
 Suspended: Years _____ Months _____
 Probation: Years _____ Months 12
 Fines: \$ 45,000

I. Disruption/Dismantlement:
 Disruption Date: _____
 Dismantlement Date: _____
 Completion of FD-515a Side 2 Mandatory

J. Civil Rico Matters Date: _____
 Also Complete "Section G"
 Other Civil Matters Date: _____
 Judgment _____
 Judicial Outcome _____ X
 Amount \$ _____
 Suspension: Years _____ Months _____

K. Administrative Sanction Date: _____
 Subject Description Code _____ •
 Type: Length:
 Suspension Permanent
 Debarment or
 Injunction Year _____ Months _____

L. Asset Seizure Date: _____
 Asset Forfeiture Date: _____
 CATS # Mandatory _____
 Check one of the three:
 Asset Forfeiture - Administrative
 Asset Forfeiture - Civil Judicial
 Asset Forfeiture - Criminal
 Do not indicate \$ value in Section D

M. Acquittal / Dismissal / Pretrial Diversion
 Acquittal Date: _____
 Dismissal Date: _____
 Pretrial Diversion Date: _____

02/28/2005

***** SENTENCING *****

SENSITIVE / UNCLASSIFIED

Case Number: 249-LR-41039
Serial No.: 14

Stat Agent Name: [REDACTED]

Stat Agent SOC: [REDACTED]

Report Date: 02/28/2005

Accom Date.: 02/16/2005

Does Accomplishment Involve	Assisting Joint Agencies	Assisting Agents SOC	Subject Name
Drugs : N	EPA		EL DORADO CHEMICAL COMPAN
A Fugitive. : N			
Bankruptcy Fraud. : N			
Computer Fraud/Abuse. : N			RA Squad Task Force
Corruption of Public Officials: N			-----
Money Laundering. : N			HSG 7

Sub. Invest. Asst by Other FOs:

1 = Used, but did not help

2 = Helped, Minimally

3 = Helped, Substantially

4 = Absolutely Essential

Investigative Assistance or Technique Used			
FINAN ANALYST	LAB DIV EXAMS	UCO-GROUP I	FT. MON-NRCSC
AIRCRAFT ASST	LAB FIELD SUP	UCO-GROUP II	FOR LANG ASST
COMPUTER ASST	PEN REGISTERS	UCO-OTHER	NON FBI LAB EX
CONSEN MONITR	PHOTO COVERAGE	NCAVC/VI-CAP	VICT-WITN COOR
ELSUR/FISC	POLYGRAPH	CRIM/NS INTEL	IO WANTED FLYR
ELSUR/III	SRCH WAR EXEC	CRIS NEG-FED	SARS
ENG FIELD SUP	SHOW MONEY	CRIS NEG-LOC	CART
ENG TAPE EXAM	SOG ASST	ERT ASST	ASSET FORF PRO
LEGATS ASST.	SWAT TEAM	BUTTE-ITC	FORF SUPPORT P
EVIDNCE PURCH	TECH AG/EQUIP	SAVANNAH-ITC	
INFORMANT/CW	TEL TOLL RECS	POC-WRCSC	

Type of Sentence . . . : PB

Date of Sentencing . . . : 02/16/2005

Federal, Local, or International (F/L/I): F

Year Month

---- -----

Time in Jail. . . :

Time Suspended.:

Probation Time.: 1

Total Fines. . . :\$ 45000

Accomplishment Narrative

SENSITIVE / UNCLASSIFIED

Squad supervisor approval
(please initial)(Accomplishment must be reported and loaded into ISRAA
within 30 days from date of accomplishment)b6 Date Prepared 2/22/05
b7C Date Loaded 2/28/05
Data Loader's Initials TCAAccomplishment involves:
(check all that apply)

- Drugs
A Fugitive
Bankruptcy Fraud
Computer Fraud/Abuse
Corruption of Public Officials
Money Laundering
Sub Invest Asst by FO (s)

Asst. FO(s) A, B, C, D

Task Force

Assisting Agencies

1. EPA

2.

File Number

249A-LR-41039

Stat Agent Soc Sec No

RA Squad

HSG, T

Assisting Agents Soc. Sec. No.

1. - -

Name:

2. - -

Name:

A. Complaint / Information / Indictment

 Federal Local International

Complaint Date: _____

Check if Civil Rico Complaint

Information Date: _____

Indictment Date: _____

B. Locate/ Arrest

 Federal Local InternationalSubject Priority: A B C

Locate Date: _____

Arrest Date: _____

 Subject Resisted Arrest Subject Arrested was Armed

C. Summons Date: _____

 Federal Local

D. Recovery/Restitution/PELP X

 Federal Local International

Recovery Date: _____

Code * ✓ Amount \$ _____Code * ✓ Amount \$ _____

Restitution Date: _____

 Court Ordered Pretrial DiversionCode * ✓ Amount \$ _____

PELP Date: _____

Code * ✓ Amount \$ _____

E. Hostage(s) Released Date: _____

Released by: Terrorist Other

Number of Hostages: _____

Child Located Date: _____

F. Conviction

 Federal Local International

Conviction Date: _____

Subject Description Code: •(____)•

For 6F, G, H-Include Agency Code

 Felony or Misdemeanor Plea or Trial

State: _____ Judicial District: _____

G. U.S. Code Violation

Required for sections A,B,F, and J
(Federal Only)

Title Section # Counts

H. Sentence Date: 2/16/2005

Sentence Type: PB •

In Jail: Years _____ Months _____

Suspended: Years _____ Months _____

Probation: Years _____ Months 12

Fines: \$ 2,500

I. Disruption/Dismantlement:

Disruption Date: _____

Dismantlement Date: _____

Completion of FD-515a Side 2 Mandatory

J. Civil Rico Matters Date: _____

Also Complete "Section G"

Other Civil Matters Date: _____

Judgment _____

Judicial Outcome _____ X

Amount \$ _____

Suspension: Years _____ Months _____

K. Administrative Sanction Date: _____

Subject Description Code _____ •

Type: Length:

 Suspension Permanent Debarment or Injunction Year _____ Months _____

L. Asset Seizure Date: _____

Asset Forfeiture Date: _____

CATS # Mandatory _____

Check one of the three:

 Asset Forfeiture - Administrative Asset Forfeiture - Civil Judicial Asset Forfeiture - Criminal

Do not indicate \$ value in Section D

M. Acquittal / Dismissal / Pretrial Diversion

Acquittal Date: _____

Dismissal Date: _____

Pretrial Diversion Date: _____

N. Subject Information (Required for all Sections excluding Section D (Recovery/PELP), Section E (Hostage), Section I, and Section L).

For Involvements/Convictions only.

- Subject related to an LCN, Asian Organized Crime (AOC), Italian Organized Crime (IOC), Russian/Eastern European, Caribbean, or Nigerian Organized Crime Group - Complete FD-515a, Side 1 Blocks A-E mandatory, F-H as appropriate.
- Subject related to an OC/Drug Organization, a VCMO Program National Gang Strategy target group, or a VCMO Program National Priority Initiative target group - Complete FD-515a, Side 1 Blocks A-C only.

X Additional information may be added by attaching another form or a plain sheet of paper for additional entries.

• See codes on reverse side.

✓ Requires that an explanation be attached and loaded into ISRAA for recovery over \$1m and PELP over \$5m.

Serial No. of FD-515

15

02/28/2005

***** SENTENCING *****

b6
b7C

SENSITIVE / UNCLASSIFIED

Case Number: 249-LR-41039
Serial No.: 15Stat Agent Name: [REDACTED]
Stat Agent SOC: [REDACTED]Report Date: 02/28/2005
Accom Date.: 02/16/2005

Does Accomplishment Involve	Assisting Joint Agencies	Assisting Agents SOC	Subject Name
Drugs : N	EPA		[REDACTED]
A Fugitive. : N			
Bankruptcy Fraud. : N			
Computer Fraud/Abuse. : N			
Corruption of Public Officials: N			
Money Laundering. : N			

RA Squad Task Force
----- ----- -----
HSG 7

Sub. Invest. Asst by Other FOs:

1 = Used, but did not help
 2 = Helped, Minimally
 3 = Helped, Substantially
 4 = Absolutely Essential

FINAN ANALYST	LAB DIV EXAMS	UCO-GROUP I	FT. MON-NRCSC
AIRCRAFT ASST	LAB FIELD SUP	UCO-GROUP II	FOR LANG ASST
COMPUTER ASST	PEN REGISTERS	UCO-OTHER	NON FBI LAB EX
CONSEN MONITR	PHOTO COVERAGE	NCAVC/VI-CAP	VICT-WITN COOR
ELSUR/FISC	POLYGRAPH	CRIM/NS INTEL	IO WANTED FLYR
ELSUR/III	SRCH WAR EXEC	CRIS NEG-FED	SARS
ENG FIELD SUP	SHOW MONEY	CRIS NEG-LOC	CART
ENG TAPE EXAM	SOG ASST	ERT ASST	ASSET FORF PRO
LEGATS ASST.	SWAT TEAM	BUTTE-ITC	FORF SUPPORT P
EVIDNCE PURCH	TECH AG/EQUIP	SAVANNAH-ITC	
INFORMANT/CW	TEL TOLL RECS	POC-WRCSC	

Type of Sentence . . . : PB

Date of Sentencing . . . : 02/16/2005

Federal, Local, or International (F/L/I): F

Year Month

Time in Jail. . .:
 Time Suspended.:
 Probation Time.: 1
 Total Fines. . :\$ 2500

Accomplishment Narrative

SENSITIVE / UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATIONb6
b7C**Precedence:** ROUTINE**Date:** 03/01/2005**To:** Little Rock**From:** Little Rock

Squad 7, Hot Springs RA

Contact: SA [redacted] [redacted]

b2

Approved By: [redacted]**Drafted By:** [redacted]: maj**Case ID #:** 249A-LR-41039 (Closed)**Title:** [redacted]EL DORADO CHEMICAL COMPANY;
ENVIRONMENTAL CRIMES - CWA**Synopsis:** Report judgements in captioned matter and request case closure.**Details:** Attached for the file are copies of judgement orders issued by the Honorable Bobby Shepherd, United States Magistrate Judge, El Dorado, Arkansas on February 24, 2005.

It is requested this matter be placed in closed status.

♦♦

060MAJ01.ec

C-6
2/21/05

249A-41039-16

SEARCHED	SERIALIZED	INDEXED	FILED
MAR - 2 2005			
FBI - LITTLE ROCK			

UNITED STATES DISTRICT COURT

Western

District of

Arkansas

UNITED STATES OF AMERICA
v.

EL DORADO CHEMICAL COMPANY

JUDGMENT IN A CRIMINAL CASE (For Organizational Defendants)

CASE NUMBER: 1:04M1023-001

P.K. Holmes
Defendant Organization's Attorney

THE DEFENDANT ORGANIZATION:

pleaded guilty to count(s) One (1) of an Information on February 16, 2005

- pleaded nolo contendere to count(s) _____ which was accepted by the court.
- was found guilty on count(s) _____ after a plea of not guilty.

The organizational defendant is adjudicated guilty of these offenses:

Title & Section	Nature of Offense	Offense Ended	Count
33 U.S.C. § 1319(c)(1)(A)	Failure to Report discharge of Pollutant to the ADEQ	09/09/2001	1

The defendant organization is sentenced as provided in pages 2 through 4 of this judgment.

- The defendant organization has been found not guilty on count(s) _____
- Count(s) _____ is are dismissed on the motion of the United States.

It is ordered that the defendant organization must notify the United States attorney for this district within 30 days of any change of name, principal business address, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant organization must notify the court and United States Attorney's Office if material changes in economic circumstances.

Defendant Organization's
Federal Employer I.D. No.: 73-1183488

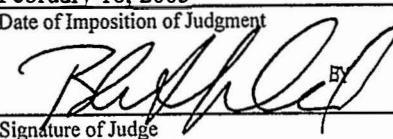
Defendant Organization's Principal Business Address:

16 South Pennsylvania Avenue
Oklahoma City, OK 73107

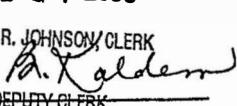
Defendant Organization's Mailing Address:

P. O. Box 231
El Dorado, AR 71730

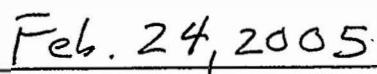
February 16, 2005
Date of Imposition of Judgment


Signature of Judge

FEB 24 2005

CHRIS R. JOHNSON, CLERK

DEPUTY CLERK

Honorable Bobby E. Shepherd, United States Magistrate Judge
Name and Title of Judge


Feb. 24, 2005
Date

This document entered on docket in
compliance with Rule 32 (d) (1) and
Rule 55 FRCrP

on 2-24-05 by AK



DEFENDANT ORGANIZATION: EL DORADO CHEMICAL COMPANY
CASE NUMBER: 1:04M1023-001

PROBATION

The defendant organization is hereby sentenced to probation for a term of :

One (1) year

The defendant organization shall not commit another federal, state or local crime.

If this judgment imposes a fine or a restitution obligation, it is a condition of probation that the defendant organization pay in accordance with the Schedule of Payments sheet of this judgment.

The defendant organization must comply with the standard conditions that have been adopted by this court as well as with any additional conditions on the attached page (if indicated below).

STANDARD CONDITIONS OF SUPERVISION

- 1) within thirty days from the date of this judgment, the defendant organization shall designate an official of the organization to act as the organization's representative and to be the primary contact with the probation officer;
- 2) the defendant organization shall answer truthfully all inquiries by the probation officer and follow the instructions of the probation officer;
- 3) the defendant organization shall notify the probation officer ten days prior to any change in principal business or mailing address;
- 4) the defendant organization shall permit a probation officer to visit the organization at any of its operating business sites;
- 5) the defendant organization shall notify the probation officer within seventy-two hours of any criminal prosecution, major civil litigation, or administrative proceeding against the organization;
- 6) the defendant organization shall not dissolve, change its name, or change the name under which it does business unless this judgment and all criminal monetary penalties imposed by this court are either fully satisfied or are equally enforceable against the defendant's successors or assignees; and
- 7) the defendant organization shall not waste, nor without permission of the probation officer, sell, assign, or transfer its assets.

DEFENDANT ORGANIZATION: EL DORADO CHEMICAL COMPANY
CASE NUMBER: 1:04M1023-001**CRIMINAL MONETARY PENALTIES**

The defendant organization must pay the following total criminal monetary penalties under the schedule of payments on Sheet 4.

TOTALS	<u>Assessment</u>	<u>Fine</u>	<u>Restitution</u>
	\$ 125.00	\$ 45,000.00	\$ - 0 -

- The determination of restitution is deferred until _____. An *Amended Judgment in a Criminal Case* (AO 245C) will be entered after such determination.
- The defendant organization shall make restitution (including community restitution) to the following payees in the amount listed below.

If the defendant organization makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

<u>Name of Payee</u>	<u>Total Loss*</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
TOTALS	\$ _____	\$ _____	

- Restitution amount ordered pursuant to plea agreement \$ _____
- The defendant organization shall pay interest on restitution or a fine of more than \$2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 4 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).
- The court determined that the defendant organization does not have the ability to pay interest, and it is ordered that:
- the interest requirement is waived for the fine restitution.
- the interest requirement for the fine restitution is modified as follows:

* Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

DEFENDANT ORGANIZATION: EL DORADO CHEMICAL COMPANY
CASE NUMBER: 1:04M1023-001

SCHEDULE OF PAYMENTS

Having assessed the organization's ability to pay, payment of the total criminal monetary penalties are due as follows:

A Lump sum payment of \$ _____ due immediately, balance due

- not later than _____, or
 in accordance with C or D below; or

B Payment to begin immediately (may be combined with C or D below); or

C Payment in _____ (e.g., equal, weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after the date of this judgment; or

D Special instructions regarding the payment of criminal monetary penalties:

The special assessment in the amount of \$125.00 and the fine in the amount of \$45,000.00 are to be paid in full within fifteen (15) days of the date of this judgment.

All criminal monetary penalties are made to the clerk of the court.

The defendant organization shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

Joint and Several

Defendant and Co-Defendant Names and Case Numbers (including defendant number), Total Amount, Joint and Several Amount, and corresponding payee, if appropriate.

The defendant organization shall pay the cost of prosecution.

The defendant organization shall pay the following court cost(s):

The defendant organization shall forfeit the defendant organization's interest in the following property to the United States:

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) fine principal, (5) fine interest, (6) community restitution, (7) penalties, and (8) costs, including cost of prosecution and court costs.

DEFENDANT ORGANIZATION: ELDORADO CHEMICAL COMPANY
CASE NUMBER: 1:04M1023-001

STATEMENT OF REASONS

- The court adopts the presentence report and guideline applications WITHOUT CHANGE.

OR

- The court adopts the presentence report guideline applications BUT WITH THESE CHANGES:

The Court finds that pursuant to Title 33 U.S.C. § 1319(c)(1)(A) the fine range in this case is \$2,500.00 to \$25,000 per day of violation.

Guideline Range Determined by the Court:

- The defendant organization is a criminal purpose organization pursuant to U.S.S.G. §8C1.1.

OR

- The calculation of the guideline fine range is unnecessary because the defendant organization cannot pay restitution pursuant to U.S.S.G. §8C2.2(a).

OR

Total Offense Level: 8

Base Fine: N/A

Total Culpability Score: N/A

Fine Range: \$ 2,500.00 to \$ 25,000.00 per day of violation

- Disgorgement amount of \$ _____ is added to fine pursuant to U.S.S.G. §8C2.9.
 Fine offset amount of \$ _____ is subtracted from fine pursuant to U.S.S.G. §8C3.4.
 Fine waived or below the guideline range because of inability to pay pursuant to U.S.S.G. §8C3.3.

RESTITUTION DETERMINATIONS

Total Amount of Restitution: \$ _____

- For offenses for which restitution is otherwise mandatory under 18 U.S.C. § 3663A, restitution is not ordered because the number of identifiable victims is so large as to make restitution impracticable under 18 U.S.C. § 3663A(c)(3)(A).
 For offenses for which restitution is otherwise mandatory under 18 U.S.C. § 3663A, restitution is not ordered because determining complex issues of fact and relating them to the cause or amount of the victim's losses would complicate or prolong the sentencing process to a degree that the need to provide restitution to any victim would be outweighed by the burden on the sentencing process under 18 U.S.C. § 3663A(c)(3)(B).
 For offenses for which restitution is authorized under 18 U.S.C. § 3663 and/or required by the sentencing guidelines, restitution is not ordered because the complication and prolongation of the sentencing process resulting from the fashioning of a restitution order outweighs the need to provide restitution to any victims under 18 U.S.C. § 3663(a)(1)(B)(ii).
 Restitution is not ordered for other reasons:

 Partial restitution is ordered, pursuant to 18 U.S.C. § 3553(c) for the following reason(s):

DEFENDANT ORGANIZATION: **E**URO~~O~~ADO CHEMICAL COMPANY
CASE NUMBER: 1:04M1023-001

STATEMENT OF REASONS

The sentence is within the guideline range and the court finds no reason to depart from the sentence called for by the application of the guidelines.

OR

- The sentence departs from the guideline range:
- upon motion of the government, as a result of a defendant's substantial assistance, or
 - for the following specific reason(s):

- 1 -

FEDERAL BUREAU OF INVESTIGATION

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b7CDate of transcription 07/09/2003

Attorney [redacted] and El Dorado Chemical employees, [redacted] and [redacted] met Assistant United States Attorney (AUSA) MARK WEBB and SA [redacted] at the second floor conference room located at Regions Bank in El Dorado. The meeting was prearranged between the government and Attorney [redacted] to discuss the government's case involving [redacted] and [redacted]

Attorney [redacted] introduced [redacted] indicating that he is the [redacted] for El Dorado Chemical and that [redacted] background is in Industrial Technology whose position for El Dorado Chemical is the [redacted]
[redacted] reports to [redacted]

Attorney [redacted] said that he was unclear as to what specifically the charge against [redacted] and [redacted] was. AUSA WEBB clarified stating the two could plea to the charge of failing to report a discharge to Arkansas Department of Environmental Quality (ADEQ).

[redacted] provided a background to the location of the discharge stating that the only treatment for Ammonium Nitrate (AN) is a biological system where bacteria, "eats it up". The discharge location is where materials not used in the production of AN are sent.

[redacted] said that [redacted] his subordinate, was the one who discovered a welding seam breach and reported it to [redacted]. The problem, according to [redacted] was that the valve discharging to the monitoring system, "had a hole" and was, "squirting" around monitoring system. The only solution to stop it, was to open the valve all the way and allow a discharge from the lake, which [redacted] did. [redacted] described the actions of [redacted] as, "he did exactly what he was told to do". [redacted] accepted responsibility for the situation while pointing out that they, "open the discharge monthly".

According to [redacted] a work order was submitted and alternative methods, such as a tap valve, was discussed with

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b7CInvestigation on 7/9/2003 at El Dorado, ArkansasFile # 249A-LR-41039Date dictated 7/9/2003by SA

MSM

249A-LR-41039-17

237msm OT. 302
This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

To: Little Rock From: Little Rock
Re: 249A-LR-41039, 04/19/2002

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b7C

AUSA Mark Webb has issued target letters to [redacted] and to [redacted] on behalf of EDCC. Copies of these letters are attached to this communication.

It is requested that this matter be opened and assigned to writer as a part of the Little Rock Division's Environmental Crimes Task Force initiative. SA's [redacted] and [redacted] of the El Dorado RA concur with the assignment of the matter to writer.

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